

From: Steve DeWitt [mailto:steven@firststatebank.net]
Sent: Wednesday, November 17, 2010 4:08 PM
To: Comments
Cc: John H. Fowler; David Fowler
Subject: Consolidated Reports of Condition and Income, 3064-0052

Re: Consolidated Reports of Condition and Income, 3064-0052

Dear Sir/Madam:

We feel two of the changes proposed for the Call Report would be best suited for larger institutions, perhaps over \$300 million in assets.

First, it seems the need to report automobile loans separately from other consumer loans would be of little benefit to most users of the Call Report when an institution either has a small automobile loan portfolio, or in the aggregate a small consumer loan portfolio. From a small bank staff's viewpoint, the added burden of recoding automobile loans would seem to be an expensive burden for little benefit.

Second, splitting out the deposits of individuals from partnerships and corporations likewise would seem to be of little benefit to users of small bank Call Reports. Again, the added burden of recoding or remapping of software is an added expense with what benefit?

Thank you for allowing us to comment on this proposal.

Sincerely,

Steven DeWitt
Executive Vice President and Cashier
The First State Bank of Burlingame