



November 23, 2010

Communications Division
Comptroller of the Currency
Public Information Room, Mailstop 2-3
Attention: 1557-0081
250 E Street, SW
Washington, DC 20219

Gary A. Kuiper
Attn: Comments, Room F-1072
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551

Submitted via Email

**Re: Proposed Agency Information Collection Activities; Comment Request; 75
Federal Register 604597; September 30, 2010; Consolidated Reports of
Condition and Income OCC: 1557-0081, FRB: 7100-0036, FDIC: 3064-0052**

Ladies and Gentlemen:

I appreciate the opportunity to comment on the proposed amendments to the Consolidated Reports of Condition and Income (Call Report), as issued by the Office of the Comptroller of the Currency (OCC), Board of Governors of the Federal Reserve System (Board), and Federal Deposit Insurance Corporation (FDIC) (collectively, the "Agencies"). While I generally support the Agencies proposal there are a few items which I believe deserve further consideration.

I. Nonbrokered Deposits Obtained Through the Use of Deposit Listing Service Companies

Customers select banks based on a variety of reasons, including referrals from other customers, advertising by banks and deposit listing services. When a customer opens a deposit account with us it is not practical for us to determine and report why they picked our particular bank. They may have picked us from the phone book, seen our billboards or newspaper advertising, been referred by a friend or seen our rates on a listing service such as www.bankrate.com. We do not pay to have our rates listed on such sites since we concentrate on relationships with local customers but it is possible that some of our customers opened their accounts with us based on those listings. While I oppose this

reporting requirement, if it is adopted the instructions should exempt deposits acquired based on deposit listing services when the bank did not take any action to have its rates listed by the service.

II. Deposits of Individuals, Partnerships, and Corporations

I disagree with the Agencies assumption that the behavioral characteristics of business depositors are significantly different than those of individuals. As a community bank our business deposit base consists of small businesses owned and operated by our individual depositors. Both deposit types provide a stable funding source. Our deposit systems classify accounts by account type not the type of taxpayer identification number on the account. This would require extensive programming changes to collect the information in this format without providing meaningful data to the Agencies. If the Agencies do adopt this requirement it should be deferred until the December 31, 2011, report to allow for the system changes necessary.

Again, I appreciate the opportunity to comment on the proposed changes. While I agree with most of the proposal I encourage the Agencies to consider these suggestions to improve the accuracy and usefulness of the information without imposing undue regulatory burden on the banking industry.

Sincerely,



Todd A. Burton
Executive Vice President/Controller