

November 15, 2010



WEST ONE BANK

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OFFICE OF
REGULATIVE SECRETARY

FDIC

Gary A. Kuiper, Counsel
Room F-1072
550 17th Street, NW.
Washington, DC 20429

**Proposed Agency Information Collection Activities Comment Request
Federal Register / Vol 75, No 189 Thursday September 30, 2010
Consolidated Reports of Condition and Income (FFIEC 031 and 041)
Re: Proposed revisions to the Call Report requirements effective March 31, 2011**

Dear Mr. Kuiper

Thank you for the opportunity to submit my comments regarding the Memorandum Item for the estimated amount of non-brokered deposits obtained through the use of deposit listing service companies.

West One Bank firmly believes that the agencies should **NOT** move forward with this addition to the Call Report, as it will place extra and undue burdens on the bank. Accurately identifying and reporting all deposits that are generated through the use of the Internet, deposit listing services and other automated services would be difficult, if not impossible, tasks to accomplish due especially for small community banks such as ours. Regulatory burden is at an all time high and relief is what should be considered not additional record keeping.

We appreciate the agencies' consideration of our strong objections to the proposed revisions of the Call Report requirements. With all due respect, we request that the agencies seriously consider the hardship that this proposal will place on community banks. We would also encourage the agencies to weigh that burden against the questionable likelihood that such a change will result in a fair and accurate evaluation of all deposits to be included in the new Memorandum Item.

Sincerely,

Michael J. Burr
Vice President

222 W. IDAHO BOX 7758
KALISPELL, MT 59904
TEL. 406-755-9781 • FAX 406-755-9794

EVERGREEN BRANCH
2604 HWY 2 EAST
TEL. 406-752-9998 • FAX 406-755-2715

www.westonebank.com



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