
From: Haynes Standard <HStandard@firststate.net>
Sent: Friday, April 19, 2013 3:42 PM
To: Comments
Subject: Consolidated Reports of Condition and Income, 3064-0052

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Federal Deposit Insurance Corporation
Washington, D.C.

Re: Proposed Revisions to Consolidated Reports of Condition and Income (Call Reports) for 2013

I wish to comment on the proposed revisions to the consolidated reports of condition and income for 2013. The particular portion of the proposed revisions to which I wish to comment regards the gathering of data by all financial institutions which offer separate deposit products to consumers compared to businesses as to a breakdown of service charges on consumer deposit accounts which is currently reported as noninterest income in Schedule RI, Income Statement. First State Bank, Wrens, Georgia is a very small bank. We do not presently have the resources which are needed to develop a breakdown of service charges by different types of customers, individual or business. Our present general ledger systems do not have separate categories for different types of depositors whether individual or business and there will be some significant costs to develop and implement changes that will be needed to report this type of breakdown on our deposit accounts. I do not see where having this type of information provides any cost benefit to you as our federal regulatory agency nor does it appear to have any public policy benefit. It will in all likelihood increase costs for my bank as well as other banks similar to mine and significantly increase the time required to complete the call report on a timely basis. Small banks do not have an infinite amount of financial, staff or technological resources that can be used to meet this type of proposed change to the current call reports. Please reconsider this proposal as it will add significantly to the regulatory and compliance burden that banks such as First State Bank already face. Thank you for giving us the opportunity to make a comment regarding these proposed revisions to the Consolidated Reports of Condition and Income for 2013.

Sincerely,

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