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November 17, 2015

Robert E. Feldman
Executive Secretary
Attention: Comments
Federal Deposit Insurance Corporation 550 17th Street, NW
Washington, DC 20429

Re: Federal Deposit Insurance Corporation Notice of Proposed Rulemaking, FFIEC 031 and FFIEC 041 ("Proposed Agency Information Collection Activities")

Dear Mr. Feldman:

Thank you for the opportunity to speak on this proposal. The three stated goals under the introduction would seem reasonable. However, I suggest any conversation may be premature at this time. The CECL or the Current Expected Credit Loss model is being worked on jointly by Regulators and the Financial Accounting Standards Board. This preliminary CECL proposal could be impacted by premature simplification of Call Reports. Close examination is suggested before dropping Call Report data points.

Additional thoughts are presented based on the proposal.

III. Discussion of Proposed Call Report Revisions

A. Deletions of Existing Data Items-
   Points two and three may have limited data since the economic recovery; they provide details on a large troubled portfolio. However, this data is important to third parties, such as Triune, in understanding the specific nature of troubled loans relative to restructured loans. This concern is highlighted and if data points are dropped, a possible reinstatement could be considered if there is another significant economic downturn.
B. New Reporting Threshold and Increases in Existing Reporting Thresholds-
   The agencies also are proposing to raise from $25,000 to $1,000,000 the dollar portion of the threshold for itemizing and describing components of ''Other trading assets'' and ''Other trading liabilities'' in Schedule RC–D, Memorandum items 9 and 10.

This represents a significant leap in threshold. All indications are 2016 will be a "hard year" for the economy. The Kansas City Federal Reserve Bank presented a 2016 forecast at the recent Agricultural Lenders Convention in MO. For the smallest banks reporting these assets, there is a potential for rounding errors. As an example, two line items at $500,001 each could round out to $2,000,000. Rounding is allowed both in accounting and on the

Call Reports. It is suggested the threshold be reduced or these items be delayed in the likelihood that 2016 may be a challenging year and perhaps not the best time to chance rounding errors.

C. Instructional Revisions-
   This section seems reasonable. I welcome the discussion of FASB and accounting citations.
E. New and Revised Data Items of Limited Applicability-
   Discussions synchronizing held-to-maturity, available for-sale, or trading securities with accounting standards is welcome.
2. Revisions to the Reporting of the Impact on Trading Revenues of Changes in Credit and Debit Valuation-
   Clarity is welcome here.
4. Revisions To Implement the Supplementary Leverage Ratio for Advanced Approaches Institutions
   Reinstatement of Schedule RC–R, Part I, item 45 is welcome.

This rule contains many points I welcome. I would urge caution on increasing the cited thresholds in light of 2016 likely be a “hard year”.

Sincerely,

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PS: Comments and discussion are always welcome