Comments: ICP-2016-25 Pub'd 8/15/16

Thank you for the time, effort, and consideration to streamline the existing Call Report for small institutions less than \$1 Billion in size. Unfortunately, the proposed changes are a small step forward and represent a marginal improvement in the time and energy it takes to prepare the report.

Although the proposed changes do represent a reduced number of reportable items, the vast majority of those items are rarely applicable to community banks such as ours. Therefore, it will do little in the way of relieving the time and resources needed to prepare the Call Report. The only benefit we can see at this time is the reduced burden in making sure those items remain N/A.

On average, it takes anywhere between 15 and 20 days to prepare the report. In that time, resources must be diverted from normal operating functions. We attempt to automate processes as much as possible, but due to the extreme detail the Call Report requires, there remains a high level of manual labor. Additionally, there is a substantial amount of time spent throughout the year trying to maintain a working knowledge of the instructions and the continual changes to the report.

We hope continued efforts are made to reduce the burdens associated with preparing the Call Report and look forward to providing feedback whenever possible.

Sincerely,
Denise Thomas

**Denise Thomas EVP & Chief Financial Officer** 

First Bank & Trust 9816 Slide Rd Lubbock, TX 79424

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