



200 East Nashville Avenue
Post Office Box 8
Atmore, Alabama 36504

Tel 251.446.6000
Fax 251.446.6007

www.unitedbank.com
Member FDIC

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Submitted Electronically

Mr. Gary A Kuiper
Counsel
Room MB-3074
Federal Deposit Insurance Corporation,
550 17th Street NW., Washington, DC 20429

Re: Proposed Agency Information Collection Activities regarding FFIEC 031, FFIEC 041, AND FFIEC 051; Document number: 2016-19268

Ladies and Gentlemen:

United Bank appreciates the opportunity to comment on the FFIEC's proposal to create a streamlined Call Report for smaller institutions. United Bank also appreciates the efforts of the Chief Accountant, Mr. Robert Storch, to engage the industry via conference calls aimed at understanding the challenges associated with the preparation of the current version of the Call Report.

United Bank's internal review of the proposed form has led to the conclusion that the form, as presented, eliminates various schedules that were necessary for more complex institutions. As such, pages that would not have been applicable to United Bank are deleted from the form. Smaller changes impact the thresholds for reporting on Schedules RI-E – Explanations, RC-F – Other Assets, and RC-G – Other Liabilities though the changes do not appear to be graded for the entire fiscal year and leave open the possibility that data points may not be reported in early quarters but required in later quarters (especially as they pertain to income and expense).

United Bank would like to offer specific comments that it would like to see incorporated into the revised form that would further reduce the time required to prepare the Call Report and align the form with current deposit thresholds and interagency workflows.

Semi-annual Reporting

United Bank requests that the agency consider reducing the required reporting dates for smaller institutions (Total assets less than \$1 billion) to a semi-annual schedule. This reporting frequency also serves as the requirement for smaller bank holding companies' reporting to the Federal Reserve and its form FR Y-9 SP.

Align Deposit Reporting to \$250,000 deposit limit

United Bank requests that the agency completely align the report to the \$250,000 deposit insurance level in schedules RC-E – Deposits and its subsequent Memoranda. Lines specifically associated with this request include RC-E-M.1, RE-E-M.2, RC-E-M.3, and RC-E-M.4

United Bank recognizes that similar changes have been made to schedules RI – Income Statement, RC-K – Quarterly Averages, and RC-O – Other Data for Deposit Insurance and FICO Assessments.

Reduce the Frequency of Detailed Reporting

If the semi-annual reporting cycle cannot be initiated, United Bank requests a reduced frequency associated with the detailed portions of the major schedules. The manual accumulation and analysis required to complete the current forms are associated with schedules such as RI-E, RC-E-Memoranda, RC-F, RC-G, RC-K, and RC-N. United Bank has attempted to compare peers using the RI-E – Explanations information and has found a lack of comparability across other financial institutions associated with these forms in particular. As such, the intended analysis based on the form's design appears to be less than ideal. As such, these schedules could be scaled back and reported on a semi-annual or annual basis.

Thank you for your time and consideration of these comments and for the agency's efforts to effectively decrease the reporting requirements on smaller institutions.

Sincerely

A handwritten signature in black ink, appearing to read "Dale Johnson", with a long horizontal flourish extending to the right.

Dale Johnson
United Bank
SVP & Controller