



October 14, 2016

VIA EMAIL

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
400 7th Street SW., Suite 3E-218, Mail Stop 9W-11
Washington, DC 20219
Attention: 1557-0081, FFIEC 031, 041, and 051
prainfo@occ.treas.gov

Robert DeV. Frierson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW.,
Washington DC, 20551
Attention FFIEC 031, FFIEC 041, and FFIEC 051
www.regulations.gov

Manuel E. Cabeza, Counsel
Federal Deposit Insurance Corporation
550 17th Street NW.,
Washington, DC 20429
Attention: FFIEC 031, FFIEC 041, and FFIEC 051
www.regulations.gov

**Re: Consolidated Reports of Condition and Income for Eligible Small Institutions;
FFIEC 031, FFIEC 041, FFIEC 051.**

Dear Agencies,

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing approximately 270 state and nationally chartered banks, savings and loan associations, and savings banks. WBA appreciates the opportunity to comment on the Office of the Comptroller of the Currency, Treasury Department, Board of Governors of the Federal Reserve System, and Federal Deposit Insurance Corporation's (Agencies) proposal for a new Consolidated Reports of Condition and Income for Eligible Small Institutions (FFIEC 051).

WBA appreciates the agencies' efforts to create a streamlined version of the existing Consolidated Reports of Condition and Income for a Bank with Domestic Offices Only by proposing to remove certain existing schedules and data items replaced by a limited number of data items to be collected in a new supplemental schedule, eliminating certain other existing data items, and reducing the reporting frequency of certain data items. However, we would like to take this opportunity to request that the Agencies consider additional changes that we believe would further alleviate the significant call reporting burdens our member financial institutions face. We hope the Agencies will evaluate and address these burdens in subsequent rulemaking.

WBA believes that the proposal for a new call report represents a logical change in the reduction of the FFIEC 051's size. However, we are concerned that the reduction of burden will not be as significant as the Agencies predict. WBA understands that the proposed revisions that will result in a smaller report, while desirable, will realistically only save our members 5-10 minutes. The changes proposed will only remove portions of the call report have become largely obsolete. The items and schedules to be removed are not currently completed and thus while pages will be removed; the removal will not result in the reduction of any work actually performed. Thus, realistically, the only practical change is a reduction in size rather than a true reduction in burden.

While WBA appreciates the items that have been revised within the proposed rule we request that the Agencies consider additional revisions. Specifically, we would like to see a re-evaluation of requirements for sections RC-C, RC-E, RC-L and RC-R. WBA does not object to the collection of such loan, deposit, and capital data and understands the Agencies' need for such, however, we believe that in order to provide practical relief to our members, those sections would require a reduction or change in reporting frequency, where limited reports are required during a given period. If a reporting financial institution does not present compliance risk, or a safety and soundness concern, WBA believes that there should be no need to complete certain areas. For example, we believe that well-capitalized banks should be required to complete RC-R only semi-annually. WBA also requests that line items not required be marked N/A or removed entirely as this is one of the more time consuming schedules for most of our members.

WBA again thanks the Agencies' for their efforts to streamline call reporting. However, we believe that the proposed rule represents more of a psychological benefit in the reduction of size but not a practical one. In order to significantly reduce the burden financial institutions face in reporting requirements the Agencies should consider simplifying and shortening sections, specifically schedule RC-C and RC-R, reporting frequency, and permit N/A be entered where line items not required are, or remove such lines entirely.

Sincerely,



Rose Oswald Poels
President/CEO