

October 6, 2016

Federal Deposit Insurance Corporation
550 17th St. NW
Washington, DC 20429

RE: New Consolidated Reports of Condition and Income for Small
Institutions (FFIEC 051)

The Bank of York would like to take this opportunity to comment on FFIEC 031, 041 and 051 respectively.

During the completion of the March 2015 Call Report we noticed a significant increase in the time it took to properly complete the report, primarily in Call Report Schedule RC-R. This section required burdensome and time-consuming manual entries that have to be tracked and put in by hand each quarter. This is due primarily for calculating Risk Weighting of our assets, derivatives, and off balance sheet items.

We incorporate a software program that helps move data to the correct fields in the Call Report, but we have no successful way to mirror this to the completion of Schedule RC-R. It is strictly subjective manual entries that causes problems and additional time in completing the report. What used to take thirty minutes to complete can now take anywhere from three to four hours. We do not feel that this additional information provides any significant benefit to the reader of the Call Report. The new report for small institutions would greatly reduce some burden on the bank's staff in completing the report each quarter.

We would also like to suggest that as new instructions are released, that they be identified or tagged to Banks they are applicable to. We often find ourselves reviewing Call Report instructions to find out that they are not applicable to our financial institution. This will help cut down on the time spent reviewing the instructions which are sometimes very long and detailed.

Thank you for the opportunity to respond to these proposed changes.

Sincerely,

Jimmy Collins
Chief Executive Officer