



October 14, 2016

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
Attn: 1557-0081, FFIEC 031, 041 and 051
400 7th Street, SW, Suite 3E-218
Mailstop 9W-11
Washington, DC 20219

Mr. Robert DeV. Frierson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Ave., NW
Washington, DC 20551

Mr. Manuel E. Cabeza, Counsel
Attn: Comments, Room MB-3105
Federal Deposit Insurance Corporation
550 17th St., NW
Washington, DC 20429

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

Dear Madam or Sir:

Thank you for the opportunity to comment on the above-referenced proposal. The Kansas Bankers Association is a non-profit trade organization with 264 of the 267 Kansas chartered commercial banks and savings loan associations as members. Kansas' network of community banks and thrifts range in asset size from \$9.0 Million to \$9.1 Billion. The average asset size is \$246 million; however, 41% of all chartered banks in Kansas have less than \$100 million in total assets. If added together, the assets of all Kansas chartered banks and savings and loan associations – state and national charters – would total \$66.7 billion. One-third of all Kansas banks have 15 employees or fewer which causes many employees to wear more than one hat at the bank.

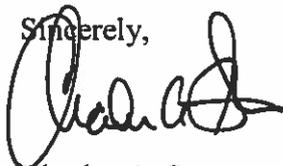
We are happy to provide comments on the proposal to consolidate Call Reports for eligible small institutions (domestic offices only and less than \$1 billion in total assets). As we read the proposal, it will remove around 20 pages from the Call Report and give eligible institutions the option of using a new Form 051.

We certainly appreciate the outreach efforts for industry comments on reducing the burden associated with the Report for eligible institutions who do not engage in activities considered complex or specialized. While we are hopeful that the proposal will reduce the time spent by bank employees who prepare the Report, bankers are unsure that the items removed will save a significant amount of time, as they are generally not applicable to banks under \$1 billion today. That said, there are a few items that are proposed to shift to semi-annual reporting which we believe will save some time on the other two quarterly Reports.

Regarding the implementation time, we would respectfully submit that as long as the existing structure of the new forms is maintained, so that no renumbering of line items occurs (simply inserting N/A for the items removed), we anticipate that KBA member banks will be able to be prepared for the March 2017 Report.

In conclusion, we appreciate the effort made when considering the proposal, to balance the reporting burden for eligible institutions against the regulators' need for reliable data to ensure the safety and soundness of the institutions. Our industry looks forward to participating in the next round of proposed changes being considered for the March, 2018 Report.

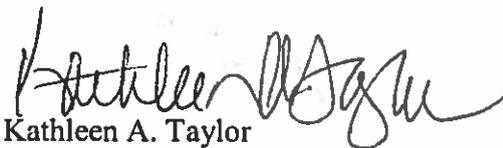
Sincerely,



Charles A. Stones
President



Terri D. Thomas
SVP-Legal Department



Kathleen A. Taylor
SVP-General Counsel