



TriCentury Bank
since 1894

October 14, 2016

RE: Small Bank Call Report Proposal FFIEC 051

To Whom It May Concern:

I am the Chief Operating Officer of a small (\$70MM) community bank and am the person who completes our bank's CALL Report on a quarterly basis. I would implore you to change and simplify this cumbersome and time consuming process, especially for a bank of our size. The CALL Report preparation and completion process is time intensive, which in turn becomes a costly endeavor for the bank. I spend the majority of an entire month completing the report four times per year.

The bank must subscribe to a CALL reporting software service on an annual basis. I ensure that all updates are loaded before beginning our reporting submission process. I generate and print no less than 30 reports off of our core bank software system. Once these reports have generated, I begin compiling manual spreadsheets and reports to become the basis for information to be transferred onto the CALL reporting software.

There are 25 schedules in the current CALL report. We only complete 13 of those schedules. There really must be a simplification of the CALL reporting process for banks of our size.

Especially tedious is the regulatory capital schedule of the CALL report (Schedule RC-R). This 21 page section of the CALL report requires so much manual processing of bank data, that it is a time intensive endeavor.

The simplification of capital rules, such as only requiring certain loan classifications to be risk rated, would in turn result in a simplification of the RC-R schedule. This, along with a condensed version of the CALL report for smaller banks would allow the CALL report to be completed with much less manual preparation and reduce the burden of this quarterly process significantly.

I strongly advocate for a change to how small and medium sized banks need to account for and report their capital structure and hope you will take action to help with this concern.

Sincerely,

Pamela Woodson

COO

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