
From: Matt Helton
Sent: Friday, October 07, 2016 4:01 PM
To: Comments
Subject: FFIEC 031, FFIEC 041, and FFIEC 051

Good Afternoon,

Citizens State Bank is very pleased to hear of the FFIEC 051 for small institutions. The current FFIEC 041 has grown too large and cumbersome for the majority of small community banks. While the proposed deletions and revisions are appreciated, it would be more desirable to have greater attention paid to schedule RC-R (Regulatory Capital). This is the most time-consuming and cumbersome section to complete for our institution, largely due to the concerns over securitization exposure and the granular risk-weighting of assets. Citizens State Bank does not have data to enter for Trading Assets, Off –Balance Sheet Assets or Liabilities, or securitization exposures outside of securities.

A further, deeper review of Schedule RC-R (Regulatory Capital) would be most appreciated prior to final implementation of FFIEC 051.

Thank you,

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