
From: Kenneth Howington
Sent: Friday, October 07, 2016 2:10 PM
To: Comments
Subject: FFIEC 031, FFIEC 041, and FFIEC 051

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Small Bank Call Report Proposal—FFIEC 051

Our bank would qualify for the proposed new FFIEC 051 revised form, as we are less than \$430 million in assets. However, in reviewing the FFIEC 041 vs the proposed new “streamlined” Call Report form FFIEC 051, the only improved efficiencies that take place is the elimination of various schedules and pages that are not applicable to our bank for which we have not had to complete in the past. The proposed elimination of these schedules does not help our bank in anyway other than reduce paper and ink. Our time spent preparing the quarterly report would not be reduced. If the proposed rules go into effect, then the only advantage is that the FFICE has generated more work for themselves but toward a wasted endeavor that has accomplished nothing for most small banks. Our reporting burden will continue unabated and with the same staff and time requirements as before. I would suggest that if the intent was to truly write rules to lessen the burden on banks our size those involved should have analyzed past filed bank reports to see what banks have actually been completing the schedules in question. From that I suspect they would have found that few small banks such as ours were doing so therefore they would not benefit from the new FFICE 051 forms.

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