
From: Amanda Smith
Sent: Friday, October 07, 2016 4:54 PM
To: Comments
Subject: August 15, 2016 - FFIEC 031, FFIEC 041, and FFIEC 051

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To Whom It May Concern:

Please see our comments below:

- 1) The amount of lead time needed would be minimal to change our system to FFIEC 051 from FFIEC 041 since they are basically the same for us.
- 2) The appropriate amount of lead time we would need to change is very minimal as well since this would be virtually no change for us
- 3) We would have the option to complete either FFIEC 041 or FFIEC 051 but it would not affect the amount of time to complete either since most of the changes do not apply to an institution of our size
- 4) The proposed revisions would have no effect on the agencies' function regarding our institution since the large majority of the information is currently not applicable to our institution
- 5) The burden of the information collected will not be affected. It currently takes us 40-50 hours to complete the call report each quarter. This will not change with the proposed revisions since most of these revisions do not apply to our institution.
- 6) The instructions to the call report are not always clear and concise; which leaves some information to be left up for interpretation.
- 7) The amount of information needed to be gathered and input is still a great burden to us.
- 8) The RCR portion is the part of the Call Report that takes the most time and is also the most crucial.

The few changes that will apply to us as far as changing reporting on certain schedules from quarterly to semiannually will not save us any time or burden. We will still have to calculate the same way.

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