

To: [Comments](#)
Subject: FFIEC 031, FFIEC 041, and FFIEC 051
Date: Thursday, October 13, 2016 11:33:19 AM

Our bank is about \$240M in assets, and is not complex; therefore, I commend the FFIEC for recognizing the need for a separate report for institutions such as ours. The call report has continuously grown and now represents a huge regulatory burden for community banks. Every quarter, it takes personnel many hours to accumulate and assemble the call report, resulting in a costly process that takes critical employees away from more important tasks. In reviewing the draft of the FFIEC 051, it quickly becomes apparent that almost all of the items being removed are the items that small, non-complex banks do not complete anyway. Simply reducing the number of pages does nothing to remove the regulatory burden for banks our size. The only way to reduce the burden is to reduce the number of detailed schedules, which seem to be more of a data gathering process than one that provides meaningful financial information. It would be more prudent, in my opinion, to have well-capitalized, highly-rated community banks report their basic financial information, including a balance sheet, income statement and changes in capital schedules.

Thank you for allowing me to express my concerns on the proposed FFIEC call report changes.

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