
From: Joe Michalko <joe.Michalko@riverbank.biz>
Sent: Friday, April 19, 2013 5:09 PM
To: Comments
Subject: Consolidated Reports of Condition and Income, 3064-0052

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To whom it may concern:

I have a comment in regards to a proposed change to the Call Report beginning on 6-30-13, in particular schedule RI. You are proposing that all institutions that offer separate products to create a new breakdown on year to date amounts of certain types of service charges on consumer deposit accounts and that they must equal Schedule RI line 5b. These are for proposed lines RI M15a, RI M15b, RI M15c, and RI M15d. To me, it sounds like that RI M15d is the line for all business related overdraft, maintenance, ATM, and service charges while the other three lines are for the consumer deposit accounts.

The changes to the Call Report give me the impression that we need to separate our consumer deposit charges from our business deposit charges. That would mean that many financial institutions are going to have to create new General Ledger accounts or spreadsheets, if applicable, to separate their consumer overdraft, service charge, and ATM fee collections from their business overdraft, service charge, and ATM fee collections.

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