

From: Sue Dispensa [<mailto:sdispensa@patriotsbank.com>]
Sent: Wednesday, August 24, 2016 2:10 PM
To: Comments
Subject: FFIEC 031, FFIEC 041, AND FFIEC 051

Dear Sirs:

I am writing to you about the comment period for the streamlining of the Call Report proposed. I am believe streamlining of the Report will assist small banks in preparation time and minimize confusion with schedules reporting data that they do not engage in that product or service. The biggest area the committee should focus on is the RC-R schedule. It is the most burdensome schedule there is!

Below are my thoughts on specifically invited comment:
Specifically invited comment:

- a) Lead time: The proposed initial implementation date is likely realistic, if the agencies release the work papers and new instructions in an expedient manner. This would need to happen to allow for research and industry training sources time to prepare to educate small bank Call Report preparers. Otherwise, consideration should be given to delaying until June 2017. This would give all small institutions time to prepare and be educated.
- b) Staggered approach: All changes should be implemented at the same time. The staggered approach would cause more burden in adjustment than all of the changes at once. It appears most of the items changed are items that most small community banks do no report anyway. Industry educators/seminar coordinators can educate bankers at one time and then make the changes. It will be easier than adjusting to changes after the full review is conducted in 2017.
- c) Options to complete 041 or 051: If the 051 does meets its intent, and does not change any of the known/accustomed schedules, then it should easier to fill out than the 041 form.
- d) Use for agencies' functions: The items deleted or changed are items the small community banks do not engage in. It is confusing in the press release on what is being changed or deleted because the header did not follow to each page – it was assumed those line items will be deleted.
- e) Estimated time of burden: The average time reported was 45 hours – which is probably a good average for a small community bank.
- f) Enhance quality, clarity of information collected; The RC-R schedule is not structured in a user friendly manner. This schedule takes the most time to prepare and most difficult to input because of the structure of the form. Ironically, this is one of the more important schedules to have completed correctly as regulatory agencies key ratings and examination schedules from this schedule. This is a vital area that should be addressed in the overall Review.

The necessity of the Call Report is evident and clear for regulatory purposes. However, there should be continuous efforts to lessen the burden of banks and efforts by regulatory agencies to clearly deliver the changes in a user friendly manner.

Sincerely,
Sue Dispensa
Patriots Bank