

I appreciate the opportunity to comment on the proposed New Consolidated Reports of Condition and Income for Eligible Small Institutions.

While the effort to reduce the reporting burden the Call Report creates is much appreciated, the proposed changes will have a very minimal impact on the amount of information reported by our institution and I would venture to guess for most institutions our size.

Below is a summary of items that will benefit our institution in each of the categories

A. Replacement of Partial or Entire Schedules with a Supplemental Schedule

- For the past three years we have met the applicable threshold, requiring our institution to report RC-P, however in 2016 we have not been required to report this information. That being said, this is a very easy schedule for us to complete. This probably takes a total of 5 minutes to complete and enter each quarter.
- ALL OTHER CHANGES IN THIS SECTION HAVE NO IMPACT ON OUR REPORTING AS THESE ITEMS ARE PRESENTLY NOT APPLICABLE FOR OUR INSTITUTION.

B. Elimination of Data Items Identified during the Statutory Mandated Full Review of the Call Report and the Review of Infrequently Reported Items.

- Schedule RI-2.c – Interest on trading liabilities and other borrowed money. This is a very easy number to obtain and report. It is a matter of adding up 4 numbers on our general ledger, which is automatically calculated in a spreadsheet we have created for Schedule RI. The first time the call report changes, this will actually cost us a little time as we revise these calculations and save us very minimal time as it is simply entering a number on the form that will now be combined with another number on the Schedule.
- ALL OTHER CHANGES IN THIS SECTION HAVE NO IMPACT ON OUR REPORTING AS THESE ITEMS ARE PRESENTLY NOT APPLICABLE FOR OUR INSTITUTION.

C. Change in Frequency of Collection.

- There are three items that we will report on a semiannual basis rather than a quarterly basis and we will end up calculating these numbers anyway since we will need them the following quarter. ALL OTHER CHANGES IN THIS SECTION HAVE NO IMPACT ON OUR REPORTING AS THESE ITEMS ARE PRESENTLY NOT APPLICABLE FOR OUR INSTITUTION.
- There are five items that we will report on an annual basis rather than quarterly. For these items we will save simple yes or no answers to 5 questions about our institutions activities. ALL OTHER CHANGES IN THIS SECTION HAVE NO IMPACT ON OUR REPORTING AS THESE ITEMS ARE PRESENTLY NOT APPLICABLE FOR OUR INSTITUTION.

As you can see from the above, these proposed changes will have very little impact on our reporting burden. The amount of time and effort saved will be negligible.

As far as the items specifically requested for comment, please see my responses below:

- (a) The amount of lead time needed would be very minimal for our institution on these changes. As you can see above this will have very little impact on our reporting and the necessary changes can be made in a matter of minutes as we prepare the call report.
- (b) A staggered approach would not be necessary to our institution for the changes currently addressed as this would have virtually no impact to our institution as previously noted. However, if more changes are on the horizon that have a more significant impact a staggered approach may be appreciated.
- (c) Our institution would have the option to complete the FFIEC 041 rather than the FFIEC 051, however it does not matter which report we file the time burden will be virtually the same.
- (d) The proposed revisions are not necessary for the performance of agencies' functions in regards to our institution as the large majority of this information is currently not applicable for our institution.

- (e) The burden of the information collection as they are proposed to be revised is negligible as we currently do not report the majority of these items and that will continue to be the case with the proposed revisions. It currently takes our institution 40-50 hours to complete the call report each quarter and this will not change with the proposed revisions.
- (f) The instructions to the call report are very cumbersome, as is the call report itself. Researching one line item on the call report can take hours and the instructions are not always clear and concise leaving some information to be left up to interpretation.
- (g) Continued effort to reduce the reporting burden is the way that will have the most significant impact on the burden of information collection. Even with the use of information technology the sheer volume of information that is required to be reported is the most prevalent burden.
- (h) It is difficult to estimate the cost of operation, maintenance and purchase of services to provide information. We pay about \$1,000 per year to maintain software just to enter and submit our call report data. We use other reporting software we have in house in order to generate the necessary reports for the call report.

As I previously mentioned, the effort to reduce the reporting burden of the Call Report is appreciated, however, I feel that the proposed changes really miss the target. Our institution is extremely disappointed with the overall impact of the proposal. These revisions essentially will not change the amount of hours we put into preparing the call report. The smallest banks with the fewest employees are the ones that need the call report reform the most and these are the institutions that will receive almost zero benefit.

Respectfully submitted,

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