

From: Doug Welch
Sent: Thursday, October 06, 2016 10:45 AM
To: Comments
Subject: August 15, 2016 - FFIEC 031, FFIEC 041, and FFIEC 051

Escambia County Bank is approximately \$80 million in assets, so we would be able to use the new FFIEC 051 Call Report. While management understands the importance of timely reporting on the financial condition of our institution, completing the Call Report is a time consuming burden to complete each quarter as it is currently structured. We currently average about 40-50 hours per quarter to complete the Call Report. In addition, the instructions for the Call Report are very cumbersome and convoluted.

As other financial institutions our size have commented that we appreciate the effort to reduce the burden that the Call Report creates, the proposed changes will have very minimal impact on the amount of time and effort it takes to prepare the Call Report. The current proposal might be a starting point for reducing the regulatory reporting burden. However, there is much more work that needs to be done in order for banks our size to realize real relief from the regulatory reporting burden.

Management has reviewed the proposed FFIEC 051 and compared to the existing FFIEC 041 Call Report. After reviewing, management determined that every schedule we currently are required to complete we will still have to complete on the new FFIEC 051 Call Report. True the number of pages of the existing Call Report have gone from 85 to 61 on the new FFIEC 051; however, our reporting burden has not been reduced at all. So the bottom line is that it will not save us any time in preparing the Call Report. In reality it will take just as long or longer if we have to make adjustments on our mapping of some of the Call Report cells.

The most burdensome schedule by far is RC-R Regulatory Capital. Just trying to interpret the instructions and completing the risk weighting is a nightmare.

In conclusion, the proposed changes will have very little impact on our reporting burden. The amount of time and effort saved will be negligible.

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