

Public Comments on Agency Information Collection Activities; Proposals, Submissions, and Approvals:=====

Title: Agency Information Collection Activities; Proposals, Submissions, and Approvals

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Comment: Thank you for the opportunity to provide my comments on the call report changes recently proposed by the Federal Financial Institutions Examination Council (FFIEC). I applaud the FFIEC for proposing a separate report for smaller financial institutions, however this proposal will only have a minimal impact on our reporting burden.

After thorough review of the proposed changes, they will have a very minimal impact at our bank except to save on paper for printing schedules that contain "NR" as Not-Reported or "NA" as Not-Applicable. A few of the changes in RC-A and RC-C will result in a few minutes of savings but otherwise these proposed changes will not lift the current burden of 40+ hours every quarter in preparation and reconciliation.

I thoroughly agree that institutions facing supervisory concerns should prepare the full FFIEC 031 or FFIEC 041, both as an incentive to strengthen their bank as well as better monitoring by the regulators. However the proposal does not assist the well managed banks with our burden. Most of the burden comes from the memorandum items for each schedule. Perhaps if these banks that are not of supervisory concern were able to not report any memorandum items in March and September, that would be outstanding regulatory relief.

While I greatly appreciate the agencies taking on this challenge of reducing our burden, I feel that this proposal falls short of providing substantive relief.

Thank you for providing me the opportunity to express my concerns with the proposed FFIEC call report changes.

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