

Dear Sirs:

I represent a bank with around \$144 million in assets in rural Alabama. I have been preparing the call reports for 5 years. I believe that agencies should continue to strive to reduce the burden on small institutions in preparing quarterly call reports. I have studied the changes proposed to be removed from the new FFIEC 051. Most of these changes will not affect our Bank, as we do not complete many of the items listed on Sections D, P, Q, S and V and only limited items on the L, and O.

Please find listed below my comments on specifically requested items:

- a. Lead Time: I would have no problem with the changes taking effect in March of 2017. However, the companies who provide the bank with Software to complete the call Reports would have to be on board with this. We would have to remap our current information to flow correctly in to the new FFIEC 051.
- b. Staggered approach: I would prefer that all changed be implemented at one time. This would help with training etc.
- c. Options to complete FFIEC 41 INSTEAD OF 51: I cannot imagine that anyone would opt to fill out the 041 if the 51 is simpler and less burdensome.
- d. Necessity of collections of information: Most of the schedules deleted are items that we as a small community bank do not engage in. By removing these you have not helped the smaller Community Banks but the largest banks because these items are not generally applicable to community banks.
- e. Estimated time of burden: Although it normally does not take me 45 hours to complete our call report, it is only because I have worked many hours in getting our call report scheduled automated to flow into our call report software. This may however be quite accurate for some institutions.
- f. Ways to enhance the quality of information: Clear and concise instructions would help with this some. A lot of the instructions are very vague.
- g. Ways to minimize the burden: Agencies should continue to listen to ICBA and other banking agencies to understand the needs of Community Banks in reducing the burdens.
- h. Estimates of costs: We pay \$899 annually for Call Report Software along with another \$124.00 for RC-R Software. However, employee time is much more of a cost than this is.

Thank you for allowing comments on these proposals. We realize that the Call Report is necessary for Regulatory Purposes. Regulatory Agencies should however continue to strive to reduce the burden on banks. It is imperative that banks see meaningful reductions in the number and detail of call report schedules and the frequency of reporting. Should this not happen we as community banks will be no better off than we were prior to the beginning of the FFIEC Review.

Respectfully,

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