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Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
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To Whom It May Concern:

The proposed FFIEC 051, which would reduce the existing Report of Condition in the number of pages and items by approximately 40%, gives the impression of being quite substantial, but in reality will have little or no impact on our institution. We are a community bank under $500 million in assets, which does not engage in any of the activities that would require us to fill out the items and schedules being eliminated.

While the removal of these items and pages will make this a smaller document to put in order, there would be no measurable relief from the existing burden. For our bank that is approximately 120 hours each quarter, and involves up to 8 employees. The most significant schedules are RC-C and RC-R. While we are aware that the regulatory agencies must be assured that risk management and capital requirements are being maintained adequately, it seems like the information needed to accomplish this could be provided in a less taxing method. It could also be reduced for those banks not subject to significant cyclical balance sheet changes that would have a concerning effect on capital. The same can be said for RC-C, in that the currently required amount of information being provided does not measure to any meaningful output when considering the loan portfolio activities of most community banks.

The proposed timeline of March 31, 2017 is too soon to implement these changes. The normal process for significant changes has been to give ample time for software modifications as well as bank's internal processes, and this doesn't appear to take that into consideration. In addition, the 1st quarter after year end is a busy time for banks. I would rather see this occur in the 2nd or 3rd quarter of 2017.

Thank you for allowing us to comment.

Sincerely,

Lynda Vice

Lynda Vice
VP/Controller
Mt. McKinley Bank