From: David Lacy
To: Comments
Subject: small bank call report proposal - FFIEC 051
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Small Bank Call Report Proposal—FFIEC 051

Our bank , in Waco, Texas would qualify for the proposed new FFIEC 051 revised form, as we are approximately $420 million in assets. In reviewing the FFIEC 041 vs the proposed new streamlined Call Report form FFIEC 051, the schedules which are being eliminated are not schedules we currently report. The proposed changes will not lessen any of our burden or reduce any our time in preparing the quarterly report. Simply removing pages/schedules, which are not applicable to small community banks like ours will not reduce or lessen the reporting burden, but will merely reduce the number of pages printed and stored for record keeping. The proposed changes fall short of providing any meaningful relief as the original reporting burden remains with the new FFICE 051 forms.

While we appreciate the effort to consider a less tedious call report process for small banks such as ours, this proposed change would really not accomplish that in any way.

David Lacy
CEO
Community Bank & Trust
Waco, Texas

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