

From: [Keith River](#)
To: [Comments](#)
Subject: call report relief for community banks
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To whom it may concern:

The era of overregulation and governmental control of community banks has made the once complex task of submitting a call report almost impossible. The recent "simplification" of call report revisions has done nothing to reduce the burden that you have placed upon us, as most of the changes that have been implemented do not even affect the vast majority of community banks.

Let me give you some background on my experience as a call report preparer. I began submitting call reports in June of 1983. If my rudimentary skills of mathematics are even somewhat correct, that is well over 120 call reports prepared and submitted to the regulatory authorities, not counting the ones to the State regulators. For a time, we had to submit call reports to both and even pay to have one published in our local newspaper quarterly on a completely different form. The FDIC report then was 30 some odd pages, done on a manual typewriter, and the State form was two pages done likewise. I could complete the task in 2 or 3 days, say 20 hours at most. If you were to add up all those submissions, I would guess that we would be well over 150 call reports.

Take for example Schedule RC-R. This report alone, at last count, has over 133 pages of instructions. I spent well over 40 hours trying to write a spreadsheet just to satisfy the reporting requirements for this schedule. If you print out the entire call report instruction booklet, it fills an entire 4 inch 3 ring binder. If I had time, I would count the pages but I hope you get the picture. Not only this, but at each and every examination we are scrutinized over every data line entry and asked to justify our results. I have no problem with verifying our data, but the time alone it takes to compile, enter, adjust our spreadsheet to changes (and yes, even this quarter has additions to our data), review, print and submit takes at least a week every quarter, or if you want to put an hour clock on it, at least 60 hours. I honestly do not know how much more data you could possibly request, but I fear to even put that statement in words.

When you submit us to examination, you already have most, if not all of the data in front of you, but still scrutinize the call report for seemingly insignificant errors and or omissions. To what end? The call report was supposed to be the tool to perform off-site examinations, as you stated in the past, but examinations come more frequently and with greater scrutiny. Gone are the days of the one-week examination, replaced with 3 or 4 week marathons, with a roomful of examiners, which further task the resolve and patience of management and staff alike. If you want to gather data to reduce the regulatory burden, especially on-site examinations, fine. I will be glad to provide you with the pertinent and accurate data that you request. That is part of my job and I will gladly comply, but in a community bank I have many hats to wear, not just a call report submission chapeau. I would humbly request that you take that information, submitted under oath and signed by our CEO and President, as an accurate representation of our Bank's financial condition. We as a \$200 million community bank simply do not have the staff to handle examinations of that frequency and magnitude and serve our main purpose, which is banking service to our customers. I would hope

that you would understand that.

Regulatory burden is just that, putting the cart before the horse. We simply cannot serve two masters. If you want us to perform our duty as spelled out in our charter and our mission statement, service to our customers and community, fine. I would respectfully request that you at least limit your scrutiny to that which is submitted to you and perform your duties accordingly, and with some semblance of restraint and respect. Then, and only then, can we perform our duties to the best of our abilities to those who truly deserve it, our customers and friends in our community.

Very truly yours,

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