

From: [Steve Zeman](#)
To: [Comments](#)
Cc: joshua.habursky@icba.org
Subject: Call Report Reform - FFIEC
Date: Tuesday, October 11, 2016 3:45:22 PM

Dear FDIC,

Thank you for the opportunity to provide comments on Call Report changes recently proposed by the FFIEC. While I commend the FFIEC for proposing a separate report for small banks, the proposal falls far short of providing any meaningful relief for community banks like mine.

As you are already aware, the Call Report continues to represent a huge regulatory burden for community banks. It takes the time of several key bank officers in my bank to prepare the necessary reports each quarter, and we have to divert the limited resources of our small management team for this bureaucratic paperwork. The hours dedicated to the preparing of the Call Report has increased significantly over the past years, as we have to keep up with over 600 pages of instructions that seem to change in some way or another each quarter. Even my small bank of \$75 million in assets with two offices and just fifteen employees is required to review and complete over three quarters of the 80 pages of the report.

For the past two years regulators have been working on a solution to this reporting nightmare, and yet the proposed changes clearly fail to address the burden. Removing data points that only apply to large banks does not fix the problem. Securitization activities, foreign government loans, venture capital activities, credit derivatives and trading activities are not lines of business that we are involved in. Removing those reports do nothing to help small banks. So, two years of work by regulators to solve the problems have failed.

Please implement the changes advocated by the community banking industry and the ICBA. A short form call report should be available to small well-capitalized community banks for the first and third quarters of each year. The information from our balance sheet, income statement and our capital accounts will provide regulators with the necessary information required to review our safety and soundness at those times. This would give my bank staff more time to devote to customer service which is about the only thing that differentiates us from huge financial institutions today.

The number of small community banks shrinks each year. As a group we do not pose a threat to the national or global economy. Reporting the detailed information on our investment, loan, and deposit activities semi-annually will be more than sufficient for policy making decisions, and it will help the small town and rural economies to have their local bankers spending more time being bankers.

Again, thank you for this opportunity to comment.

Sincerely,

Steve Zeman

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