

From: [Tamra Trull](#)
To: [Comments](#)
Subject: August 15, 2016 - FFIEC 031, FFIEC 041, and FFIEC 051
Date: Wednesday, October 12, 2016 11:42:50 AM

Any and all regulatory reporting relief for call report would be appreciated. 99% of the currently proposed changes do not apply to our bank as we do not populate this data due to our size and non-complex structure. We are a small community bank with one office, 32 employees and \$215 million in assets and are basically very vanilla in our balance sheet structure and account offerings. The proposed removal or consolidation of certain items does relieve the burden of reviewing those items each quarter to verify they still do not apply to our financial institution but more substantial relief is needed. The agencies' proposed regulatory changes are insufficient and additional consideration should be given to more meaningful reform.

Suggestions of other schedules or line items to consider changing:

- RC-C Part II. Loans to Small Businesses and Small Farms could be reduced to annually as the information we submit changes very little from quarter to quarter. Why ask the Yes or No question in line 1 and 5? Either have everyone complete lines 3, 4, 7 and 8 or lines 2 and 6.
- RC-E Deposit Liabilities - Change deposit break downs to: Less than \$250,000 and greater than \$250,000 verses less than \$100,000, between \$100,000 to \$250,000 and greater than \$250,000.
- RC-R Regulatory Capital is the most significant burden. The current complexity of the capital rules needs to be addressed and simplified in order for RC-R to be simplified. We currently spend more time on this schedule than any other individual schedule.

Thank you for your consideration.

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