From:	George Odom
To:	<u>Comments</u>
Subject:	FFIEC 031, FFIEC 041, and FFIEC 051
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Our CFO was considerably more politically correct than I intend to be by responding regarding Call Reports. Our previous Cashier at FSB used to complete either a 2 or 4 page report. For over 20 years I was responsible for completing the call report, having a degree in Accounting and working at 2 different banks.

The report took 4 continuous hours to complete, which was from 8:00 until midnight 4 times annually and balancing all schedules to the penny, with no interruption while waiting on customers. It now takes two full work days to complete and our CFO is smarter than either of us were. It appears to be nothing other than a data gathering process, where in a lot of cases neither State or FDIC examiners can provide accurate answers for completing. We've had a Camel 1 rating for 14 years since our arrival and many more before us. During our watch, we have seen many bank failures as a result of the recession and abuses in large banks in their mortgage departments, and most recently Wells Fargo's abuses. It's almost amusing, if it weren't so sad that neither the data provided or examinations of the larger institutions did anything to provide data that would have help in forecasting the inevitable. The only schedules that have been alleviated with this cumbersome paperwork were the blank ones for small banks. The proposed changes do nothing for the smaller institutions in helping them complete the forms.

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