Subject:	Comments regarding Call Report complexities, proposed revisions & timeline for revisions
Date:	Thursday, October 13, 2016 2:22:10 PM

To whom it may concern:

I would like to comment on the complexities of preparing the call report, proposed changes and the timing of the changes.

We are a community bank under $500 million, not complex, not a credit card issuer, not a mortgage servicer, not reporting assets at fair value and we have a very clean loan portfolio. With that being said, it still takes a minimum of 2 weeks to gather, input, analyze and adjust information to prepare the call report. We utilize Call Report software, which interfaces information from our core system and from spreadsheets containing information from third party reports. However, it's necessary to make numerous manual adjustments to that data in order to break it down into the detail required by the Call Report. Our core system is limited in it's ability to break down data that coincides exactly with call report line items, so there's considerable research and manual input required, especially with regards to loans. With the number of manual adjustments needed, the risk for reporting errors increases, so there's a lot of time spent checking and re-checking data.

The loan related schedules that are most cumbersome are RC-C & RC-L. We spend considerable time collecting and figuring out what line item to report un-booked commitments on for RC-L. On the deposit side, RC-E can be quite time consuming, primarily due to gathering and inputting public funds data, the breakout of demand deposits for RC-E7b and breakout of EDU IRAs for correct reporting as CDs. Additionally, we manually reclassify unposted Deposit items to the categories they were supposed to post to. It usually takes several hours to research and determine what line item to include these on for schedules RC, RC-E, RC-Em and RC-O.

RC-R has become much more difficult and time consuming since the changes came into affect March 2016 (HVCREs, changes in risk weighting %, split out of Multi-family >$1 million risk weighting, etc.).

In reviewing the proposed changes to the call report, I found less than 1% of the proposed eliminations or reductions in reporting requirements will affect our bank. I expect that will be the case for many community banks. The few items that will be eliminated from our reporting are duplicate items, so of no real benefit to us.

With regards to proposed changes in the threshold from $25,000 to $100,000, I believe the change is a step in the right direction, but will not have significant affect for most community banks. An increase to possibly 5% - 7% of the totals would provide true relief while still providing ample information for regulatory analysis.

Adjusting definitions and treatments to be consistent with other regulatory reports and other banking functions would be beneficial and more efficient for everyone.

I realize the importance of gathering and analyzing bank data, but question the detail to which we are required to break it out, as well as the frequency for which a well-capitalized, consistently highly rated bank must report at this detailed level. The call report should serve as a safety and soundness measurement along with examination ratings and not include information/details not necessary for that determination. I agree with numerous other bankers suggestions, that it should be sufficient for well-capitalized, highly rated community bank to file a much abbreviated report each quarter, with a full call report annually or semi-annually. Regardless of the frequency, I feel strongly there need to be revisions to the full call report to reduce the burden.

I'm also in agreement with colleagues, that implementation of the proposed changes be no sooner that June 2017. This would allow the time critical for institutions to work with core processors, software providers and their own staff to update system and reporting parameters.

I appreciate the opportunity to give input about this very important issue and appreciate your efforts to help alleviate some of the reporting burden institutions face.

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