



January 18, 2019

VIA ELECTRONIC DELIVERY

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
400 7th Street, S.W.
Suite 3E-218, Mail Stop 9W-11
Washington, D.C. 20219
OCC; Docket ID OCC-2018-0032

Ms. Ann E. Misback, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551
Docket No. R-1618; RIN 7100 AF12

Mr. Robert Feldman, Executive Secretary
Attention: Comments/Legal ESS
Federal Deposit Insurance Corporation
550 17th Street, N.W.
Washington, D.C. 20429
FDIC RIN 3064-AE82

RE: OCC Docket ID OCC-2018-0032; FRB Docket No. R-1618; RIN 7100 AF12; FDIC RIN 3064-AE82

Dear Ladies and Gentlemen:

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing approximately 230 state and nationally chartered banks, savings and loan associations, and savings banks located in communities throughout the state. WBA appreciates the opportunity to submit comments on changes to the Call Report proposed by the Office of the Comptroller of the Currency, the Board of Governors of the Federal Reserve System, and the Federal Deposit Insurance Corporation (Agencies) which are intended to implement Section 205 of the Economic Growth, Regulatory Relief, and Consumer Protection act (EGRRCPA). Section 205 of EGRRCPA requires the Agencies to issue regulations to allow for reduced reporting on reports of condition (Call Reports) filed for the first and third calendar quarters for insured depository institutions with less than \$5 billion in total assets that meet other criteria the Agencies determine are appropriate (covered depository institutions).

To implement this requirement, the Agencies' proposed regulations would expand eligibility to file the most streamlined Call Report, the FFIEC 051 Call Report, to include certain institutions with less than \$5 billion in total assets that meet other criteria; and establish the FFIEC 051 Call Report as the version of the Call Report that provides reduced reporting for the first and third calendar quarters of a year. In addition, the agencies are proposing to reduce the reporting frequency for a number of existing data items in the FFIEC 051 Call Report that currently are reported quarterly, which would further streamline the report in the first and third quarters. For institutions with total assets of \$1 billion or more, the Agencies also are proposing to add to the FFIEC 051 Call Report certain data items that these institutions

currently report in the FFIEC 041 Call Report, but generally with reduced reporting frequency. These changes to the FFIEC 051 reporting requirements are proposed to take effect March 31, 2019.

WBA wishes to voice our concerns about the Agencies' proposed rulemaking for reducing the Call Report for banks under \$5 billion in assets. We are aware that many institutions believe the proposal does not provide any meaningful reduction in the burden of preparing the Call Report. Certainly, for institutions with less than \$1 billion total assets with no fiduciary assets or troubled debt restructurings, it provides little relief at all. In addition, we are aware that institutions with assets of \$1 billion or more, but less than \$5 billion, are concerned that the Agencies are proposing to add back into the 051 Call Report for certain banks some items in the 041 Call Report that are very burdensome to compile and disclose. For instance, the agencies are proposing to require banks with assets between \$1 billion and \$5 billion to complete specific questions about overdraft-related service charges on consumer accounts, monthly maintenance charges on consumer accounts, and consumer ATM fees.

When Congress passed EGRRCPA (specifically Section 205 entitled "Short Form Call Reports"), it intended for the banking agencies to establish a new Short Form Call Report that would significantly reduce the reporting burden for community banks for the first and third quarters of each year. Congress did not intend for the banking agencies just to reduce a few items on the existing 051 Call Report or eliminate those items that generally do not apply to most community banks.


In addition, Congress did not intend for the banking agencies to just modestly streamline the existing 051 Call Report or add additional items to the 051 Call Report for institutions with assets of \$1 billion or more, but less than \$5 billion, to collect consumer protection data elements disguised as safety and soundness metrics.

The new Short Form Call Report should be one that can be completed quickly and effortlessly without the need to include supporting schedules, or data that has nothing to do with the safety and soundness of the bank. As the Agencies have noted, the current proposed removal of reporting items in the existing 051 Call Report would only reduce the current average quarterly reporting burden by 1.18 hours for institutions with assets less than \$1 billion and 12.18 hours for institutions with assets of \$1 billion or more, but less than \$5 billion. The removal of these reporting items barely begins to address the changes that are needed to bring real Call Report relief. WBA, therefore, recommends the Short Form Call Report be limited to the balance sheet, income statement, and statement of changes in shareholders' equity.

The banking agencies should meet Congressional intent by providing a simple, easy to complete, and minimally burdensome Short Form Call Report and, for institutions with assets of \$1 billion or more, but less than \$5 billion, does not include additional questions about consumer deposit accounts in the first and third quarters.

Once again, WBA appreciates the opportunity to comment on this important matter.

Sincerely,

A black rectangular redaction box covering the signature of Rose Oswald Poels.

Rose Oswald Poels
President/CEO