

From: Comerica Incorporated, Thad A Schaefer  
Subject: Call reports

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Comments:

Via Electronic Mail ([comments@FDIC.gov](mailto:comments@FDIC.gov))([regs.comments@federalreserve.gov](mailto:regs.comments@federalreserve.gov))

Federal Deposit Insurance Corporation  
Attn: Gary A. Kuiper, Counsel  
Re: Consolidated Reports of Condition and Income, OMB Number: 3064-0052

Board of Governors of the Federal Reserve System  
Attn: Jennifer J. Johnson, Secretary  
Re: Consolidated Reports of Condition and Income (FFIEC 031 and 041)

Dear Mr. Kuiper and Ms. Johnson:

Comerica Incorporated appreciates the opportunity to comment on the continued collection of data on the Consolidated Reports of Condition and Income (the "Call Report").

Comerica Incorporated (NYSE: CMA, "Comerica") is one of the twenty-five largest financial services company based on the United States with approximately \$55.0 billion of total assets as of March 31, 2011. Headquartered in Dallas, Texas, the company is strategically aligned by three business segments: The Business Bank, The Retail Bank, and Wealth & Institutional Management. Comerica focuses on relationships, and helping people and businesses be successful. In addition to Texas, Comerica Bank locations can be found in Arizona, California, Florida and Michigan, with select Comerica businesses operating in several other states, as well as in Canada and Mexico.

Comerica supports the bank regulatory agencies' efforts to collect information from insured depository institutions ("IDIs") that is not currently collected on the Call Report. However, the burden of collecting such new information, based on the proposed timeline for reporting such information as of the June 30, 2011 report date, is of great concern to us.

Not only do the proposed changes require IDIs, like Comerica, to collect a large amount of information not currently reported on the Call Report, it also requires IDIs to collect a large amount of information that is not currently collected on a regular basis for other purposes. Some of this data is based on financial circumstances of the borrower on the date of origination or renewal of the loan. This data may or may not be captured systematically and is likely going to require a significant manual effort, if available at all.

Additionally, for certain loans that are acquired as a result of a business combination, there may be additional limitations on the acquiring IDI's ability to gather this information. The new information sought for the Call Report places an extraordinary burden on IDIs because the collection of such information is inconsistent with current reporting practices. Moreover, we are very concerned that the burden of collecting this new information for, and reporting it on, the June 30 Call Report will make it extremely difficult for our officers and directors to certify to the accuracy of such Call Report.

While we believe the required information can be collected, it is possible that some of this information will not be available for the June 30 Call Report timeline.

In recent rulemakings, we believe the regulatory agencies have been sensitive to minimizing the burden on IDIs and relying on existing, available information at IDIs. We believe the new Call Report information imposes an unintended, but significant, extreme burden on IDIs to collect and report, as well as certify the accuracy of, certain information, which has not been previously collected for the Call Report purposes (or otherwise in most instances), within a relatively short timeframe.

We respectfully request that the regulatory agencies permit IDIs to provide currently-reported information through the December 31, 2011 Call Report date. As we and other IDIs devote extensive time and resources to this rule, we need reasonable time to make the necessary system and procedural changes required to report accurate data. A timeframe extension would provide sufficient time for IDIs to develop proper methodologies and procedures to collect the new Call Report information in a manner that will enable IDI officers and directors to certify the accuracy of such information being reported in the Call Report.

On behalf of Comerica, I would like to reiterate our strong commitment to legal and regulatory compliance. We are very appreciative of the recent efforts being undertaken by the regulatory agencies, and we thank you for your consideration of our comments.

Sincerely,

Thad A. Schaefer  
Comerica Incorporated