

From: New Tripoli Bank, Ann Bavaria
Proposal: FFIEC 0031 & 0041 (ICP #13-5; pub'd 2/21/13)
Subject: Call Reports for banks and savings associations with (FFIEC 031) and without domestic and foreign of

Comments:

Date: Apr 02, 2013

Proposal: Agency Information Collection [ICP-201305]
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Your comment: Federal Reserve Board of Governors
<http://www.federalreserve.gov/generalinfo/foia/ProposedRegs.cfm>
Subject: Consolidated Reports of Condition and Income (FFIEC 031 and 041)

To Whom It May Concern:

New Tripoli Bank is a \$343 million institution, based in New Tripoli, Pennsylvania. We are requesting clarification on the proposed revisions to the Call Report data. Specifically, we are requesting clarification on the definition of "separate deposit accounts" as it pertains to the proposed screening question that would be added to the Schedule RC-E, Deposits Liabilities asking whether the reporting institution offers separate deposit products (other than time deposits) to consumers compared to businesses. Although our system titles the products as Personal Deposit Account or Business Deposit Account, all the terms and conditions, including fees, are exactly the same. We are asking whether we can assume that although these accounts have different nomenclatures, that they are not two "separate" deposit products under your current proposal. As a small community bank it would require major personnel time to research and recode the distribution of fees between personal and business deposit accounts.

Thank you for your time and consideration.

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