

From: EQUITY BANK, Bruce Benyshek
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:

RE: The addition of proposed new data items and proposed revisions, to take effect as of the June 30, 2013 report date, for call report schedules RC-E Deposits and RI Memorandum, that would require tracking of all account-based revenues, such as NSF, service charges, ATM charges, and debit card charges, by consumer vs. business.

We do not have the existing data or systems to adequately track this information so will require more time for development. Thus, we request that these proposed changes to not become effective on the proposed date, if at all, but at a later time.

Thank you for your consideration.

Bruce Benyshek, CPA, CVA, CMAP, CGMA | EVP/CFO
EQUITY BANK