

From: Elderton State Bank, Russ Miller
Proposal: FFIEC 031, 041 & 051 Call Reports (ICP#2016-25; Pub'd 8/15/16)
Subject: Consolidated Report of Condition and Income (Call Reports)

Comments:

Public Comments on Agency Information Collection Activities; Proposals, Submissions, and Approvals:
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Comment: After reviewing the proposed changes for the "new" FFIEC 051, I would have to say that I am disappointed. Everything that is being eliminated, both data items and schedules, are items that we never filled out anyway. And I would also be willing to bet that almost all of the institutions that would be eligible to fill out the "new" FFIEC 051, they also do not fill out those line items and schedules. So this so called streamlined, less burdensome, proposed call report is of no relief to the institutions who are eligible for it. You are doing what you said, eliminating the pages from 85 to 61, but as far as I can see, you are in no way eliminating any work, just pages. If you really wanted to help small institutions, you would be discussing how to simplify and shorten such things as Schedule RC-C and especially Schedule RC-R.