

From: Security Trust & Savings Bank, Paula E. Balder
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:

The Reporting of Capital Conservation Buffer is not necessary for Community Banks. I have worked for a Community Bank for over 30 years, and have been doing the CALL Report for 16 of those years. The CALL Report gets longer and more burdensome every year with new regulations, and I have several pages now that have all blanks, or unnecessary for our size of Bank. The new RC-R, part 1, portion of the CALL is ridiculous. This newest "Capital Buffer" is not for Community Banks. We don't pay our Executive Officers exuberant wages or bonus payments, we can't. I have worked for three Community Banks in Iowa and not one of the Executive Officers would come close to this minimum. And then, to make it even worse on CALL preparers; we put a -0- in items #47 and #48 of the Schedule RC-R, Part 1. Received a call from the Federal Reserve that we could not put a -0- there, it had to be blanked out. But that would not work when I would send the report. Did this happen to several CALL preparers? So the software owner had to be called, and make an adjustment to the program, just so that item would be blank.

This portion of the CALL report needs to be eliminated completely for Community Banks.