

From: Farmers & Merchants State Bank, William Hogan
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:

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Your comment: First I support any effort to streamline reporting. After reviewing the changes I was disappointed to find the hype of "85 to 61 pages", "40% of lines reduced", and "2400 data items" does not actually save my \$165M bank any time or effort. You have merely deleted the line items that are already non applicable to most community banks. Until various agencies of government can function on less data I expect no real relief is ever forthcoming. For a Community Bank Schedule RC-R could be significantly reduced, by seriously considering the applicability of Basel III rules to small institutions. RC-C should end at line 12 eliminating the Memoranda and part II.