

From: Security National Bank, Kelly L. Puhl
Proposal:
Subject: Consolidated Report of Condition and Income (Call Reports)

Comments:

Regarding request for comments on proposed FFIEC 051 Call Report for eligible small institutions:

* I do not see a time savings or alleviated burden from the removal of, or changes to, line items proposed. The amount of line items produced and paper generated will be reduced, simplifying the look of the proposed FFIEC 051. Time spent preparing or accumulating data will not be affected.

* Our bank is part of a multi-bank holding company. Two banks would be eligible to choose form 051 and one would continue using form 041, given the \$1billion total asset definition. Should all three report on the same form, or use two different forms? Has there been consideration on how the varying forms will flow to, and expectations going forward, of the consolidated Y9-C report? Software vendors will need to match the applicable line items for each form of the Call Reports to the consolidated Y9-C.

* The definition of "eligible small institution" is stated as institutions with total assets less than \$1billion. Footnote 4 of the Federal Register Vol. 81, No. 157 notes that the agencies are committed to exploring alternatives to the \$1billion asset-size threshold that could extend eligibility to additional institutions. This is something that I would strongly encourage. Could a formula similar to that used for the CRA definition of "small institution" be used (\$1.216 billion effective January 1, 2016)?

Thank you for your consideration,

Kelly L. Puhl
Controller

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