January17, 2019

Legislative and Regulatory Activities Division
Office of the Comptroller of the Currency
400 7th Street SW, Suite 3E-218
Washington, DC 20219

Ms. Ann E. Misback, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551

Mr. Robert E. Feldman, Executive Secretary
Attention: Comments/Legal ESS
Federal Deposit Insurance Corporation
550 17th Street NW
Washington, DC 20429

Re: Reduced Reporting for Covered Depository Institutions – Docket ID OCC-2018-0032, Docket No. R-1618 and RIN 7100-AF12, and FDIC RIN-3064-AE82

Dear Mesdames and Sirs:

The Community Bankers Association of Illinois ("CBAI"), which proudly represents approximately 320 community banks, appreciates the opportunity to provide our observations and recommendations on the Office of the Comptroller of the Currency, Board of Governors of

CBAI is one of the largest state banking associations in the nation. CBAI is a professional trade association representing 320 Illinois commercial banks and thrifts, and their 880 Illinois bank branches. Its members have nearly $80 billion in assets and employ approximately 16,000 individuals. CBAI is headquartered in Springfield, Illinois, and was founded in 1974 to exclusively represent and serve the community-banking profession. For more information, visit www.cbai.com.

the Federal Reserve System and the Federal Deposit Insurance Corporation (collectively the "Agencies" or "Regulators") Notice of Proposed Rulemaking with Request for Public Comment ("Proposal") regarding Reduced Reporting for Covered Depository Institutions ("Call Reports") .

CBAI has been a strong advocate for Call Report regulatory relief dating back to 2014 when 15,000 community bankers (1,000 from Illinois) submitted a petition calling for relief from the increasingly onerous Call Report requirements. In comment letters to the Agencies dated September 2, 2014, October 14, 2016 and August 28, 2017 (which are incorporated by reference herein with the links below), CBAI has repeatedly urged the Regulators to provide meaningful Call Report relief, but all previous rulemaking proposals have been insufficient. CBAI is disappointed that the Agencies have not more positively responded to community banks in their reasonable request for Call Report regulatory relief.

As a result of the Agencies implementing insufficient Call Report relief, in 2018 Congress intervened and included Section 205 in the bipartisan Economic Growth, Regulatory Relief and Consumer Protection Act (S. 2155). This Section clearly states the intent of Congress for the Agencies to issue additional regulations for a meaningful reduction in reporting requirements for covered depository institutions when they make the first and third report of condition for a year.

Unfortunately, even this Proposal, which is meant to comply with Section 205 of the Act, falls short of the mark of meeting the reasonable needs of community banks and clear Congressional intent. **CBAI again urges the Agencies to only require the Balance Sheet, Income Statement and Changes in Bank Equity Capital in a new short-form Call Report for covered depository institutions for the first and third quarters of a year.**

If you have any questions, please feel free to contact the undersigned at 1-847-909-8341 or at davids@cbai.com.

Sincerely,

/s/

David G. Schroeder
Senior Vice President
Federal Governmental Relations

http://www.cbai.com/downloads/FFIEC%20Comment%20Letter%20September%202014.pdf
http://www.cbai.com/downloads/FFIEC-Comment-Letter-October-20-2016.pdf
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