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January 29, 2021

Chief Counsel's Office
Office of the Comptroller of the Currency
Attention: 1557-0081
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. Manuel E. Cabeza
Counsel
Attention: Comments, Room MB-3128
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Re: Call Report Reporting Revisions

Dear Ladies and Gentlemen:

The Independent Community Bankers of America ("ICBA")[1] appreciates the opportunity to provide comments on the joint notice of proposed agency information collection activities, *Proposed Agency Information Collection Activities; Comment Request* for call report reporting revisions. ICBA and the nation's community banks thank the agencies for renewing for another three years the FFIEC 031, 041, and most importantly the 051 quarterly call report. ICBA recognizes the tremendous effort that the agencies have put forth to establish and maintain a framework for the FFIEC 051 call report that provides regulatory relief to the nation's overburdened community banks.

ICBA also appreciates the accommodations that the banking agencies are making to account for the impact of Paycheck Protection Program (PPP) lending arrangements that community banks

[1] The Independent Community Bankers of America® creates and promotes an environment where community banks flourish. With more than 52,000 locations nationwide, community banks constitute 99 percent of all banks, employ more than 760,000 Americans and are the only physical banking presence in one in five U.S. counties. Holding more than $4.9 trillion in assets, $3.9 trillion in deposits, and $3.4 trillion in loans to consumers, small businesses and the agricultural community, community banks channel local deposits into the Main Streets and neighborhoods they serve, spurring job creation, fostering innovation and fueling their customers' dreams in communities throughout America. For more information, visit ICBA's website at www.icba.org.

are actively participating in to provide much needed economic relief to the nation's small business concerns and other impacted organizations. The one-year suspension of the measurement date for determining the minimum asset threshold required for FFIEC 051 eligibility, the adjustment to the date for determining the community bank leverage ratio, and the adjustments to certain call report reporting thresholds, are critically needed at this time as community banks are forced to modify their traditional financial statement metrics to serve the nation's PPP borrowers.

ICBA requests that the agencies consider the impact of the COVID-19 pandemic on the nation's smaller communities and the uncertainty surrounding future economic conditions in these communities by proposing additional call report regulatory relief so that these institutions can focus more attention on serving community bank customers and less attention on regulatory reporting burdens. Currently, banks with total assets of less than $5 billion are eligible to use the shorter form FFIEC 051 call report. **Raising the $5 billion threshold to $10 billion in total assets would increase the number of community banks eligible to use the FFIEC 051 call report and would be a great start toward realizing needed regulatory relief without compromising safety and soundness.**

The federal banking agencies have proposed to renew the FFIEC 031, FFIEC 041, and FFIEC 051 call reports for the next three years. In addition, the banking agencies have proposed to implement flexibility surrounding the asset thresholds used to determine applicability of streamlined reporting requirements. Without such relief measures, community banks that have participated in COVID-19 stimulus activities could trigger reporting requirements solely due to participation in those programs.

The agencies currently propose to permit an institution to use the lesser of total consolidated assets as of December 31, 2019 and June 30, 2020 to determine eligibility for using the streamlined FFIEC 051 call report in 2021, a call report that would otherwise be limited to financial institutions with total consolidated assets of $5 billion or less as of June 30, 2020. Community banks that seek to use the community bank leverage ratio to measure regulatory capital will be permitted to use the lesser of the institution's total assets as of December 31, 2019 or the quarter-end report date.

Furthermore, to identify which financial institutions have crossed asset thresholds used to determine the reporting of additional data items for call reports applicable to reporting periods in 2021, the banking agencies are proposing to permit an institution to use the lesser of total consolidated assets reported in the call report as of December 31, 2019 and June 30, 2020. Institutions eligible for this regulatory burden relief are limited to those with total assets up to $10 billion. Impacted asset threshold reporting includes the $100 million threshold to report other borrowed money in Schedule RC-K, the $300 million threshold to report additional agricultural lending in various schedules, the $300 million threshold to report certain information on credit card lines in Schedule RC-L, the $300 million threshold to report cash and balances due from depository institutions in Schedule RC-A, and many others. All of these proposals will give community banks that participated in the SBA PPP program much need regulatory relief not only with regard to their call reporting responsibilities but also their capital requirements.

ICBA appreciates the opportunity to comment on this notice of proposed agency information collection activities and request for comment. If you have any questions or would like additional information, please do not hesitate to contact me at (202) 821-4364 or james.kendrick@icba.org.

Sincerely,

/s/

James Kendrick
First Vice President, Accounting and Capital Policy