

**From:** Amy Baker [mailto:AmyB@csbnow.com]

**Sent:** Tuesday, March 12, 2013 12:01 PM

**To:** Comments

**Subject:** February 21, 2013 - Consolidated Reports of Condition and Income, 3064-0052

To Whom it May Concern:

We are a \$220 million community bank in rural Northwest Illinois. I am commenting on proposed changes to the Consolidated Reports of Condition and Income with the implementation date of June 30, 2013 on Schedule RC-E. We are concerned with the timeframe that this proposal is suggesting for these changes and the amount of time and money that will be spent making these changes. We currently offer separate accounts types for businesses and consumers based on each of their individual needs. However, our general ledger and deposit platform is not setup to track the service charges separately. To make this change would require new account setups, new service charges for each type of deposit account, employee time doing more manual research, and working with third-party vendors to comply with these requested breakouts. Being a community bank, as I am sure you will find with the majority of community banks, our focus is on growth and building customer relationships. The results of this extra time and money spent to collect this data, I feel, would be insignificant as the fees that are charged are minimal. They have to be in order to continue to grow and retain customer relationships. We feel that this breakdown should be kept at the larger, more highly- complex institution level. At a minimum, for this data to be accurate, a timeframe of at least one year would be needed to implement the above changes. Thank you for allowing our comments and concerns to be expressed.

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