

From: Thomas Derise [mailto:TDerise@1stconstitution.com]

Sent: Monday, March 04, 2013 12:44 PM

To: Comments

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

To Whom It May Concern:

Our Bank currently uses one general ledger account each for reporting Overdraft and Account Maintenance charges, regardless of whether the account is Business or Personal.

To comply with the proposed change to the **Schedule RI Line M15** detail for June 30, 2013, we would have to create two new sets of general ledger accounts, and re-code all of our Deposit subsystems to identify which of the two general ledger accounts (Business or Personal) each account should be associated with.

I believe the current implementation timeframe (June 30, 2013) would cause undue hardship on our Bank; therefore, I would like consideration be given to postponing this proposed change.

Respectfully submitted,

Thomas E. Derise
Vice President - Controller
1st Constitution Bank
Cranbury, NJ 08512
609-578-4425

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