



Amarillo National Bank

ROSS KERNS, CPA
SENIOR VICE PRESIDENT & CONTROLLER

September 30, 2015

Legislative & Regulatory Activities Division
Office of the Comptroller of the Currency
Attention "1557-0081, FFIEC 031 and 041"
400 7th Street, SW, Suite 3E-218
Mail Stop 9W-11
Washington, DC 20219
OMB Number: 1557-0081

Robert DeV. Frierson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue NW
Washington, DC 20551
OMB Number: 7100-0036

Gary A. Kuiper, Counsel
ATTN: Comments, Room MB-3074
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429
OMB Number: 3064-0052

RE: Proposed changes to FFIEC 031 and FFIEC 041 Schedule RC-E

Dear Ladies and Gentlemen:

Amarillo National Bank appreciates the opportunity to comment on the proposed changes to the FFIEC 031 and FFIEC 041 forms ("Call Report") published on September 8, 2015 to streamline reporting requirements for community banks.

Our concern is strictly with the proposed changes related to Schedule RC-E, "Deposit Liabilities". All of the December 31, 2015 proposed changes on this schedule relate to the permanent increase of the standard maximum deposit insurance amount from \$100,000 to \$250,000. However, if the intention of the changes was to reduce the



Amarillo National Bank

burden associated with Call Report requirements for community banks, we respectfully believe there are several other Memoranda items on Schedule RC-E that were overlooked. Please refer to the highlighted items below:

Memoranda

Dollar Amounts in Thousands		RCON	Bil	Mill	Thou	
1. Selected components of total deposits (i.e., sum of item 7, columns A and C):						
a. Total Individual Retirement Accounts (IRAs) and Keogh Plan accounts	6835					M.1.a.
b. Total brokered deposits	2365					M.1.b.
c. Fully insured brokered deposits (included in Memorandum item 1.b above): ²						
(1) Brokered deposits of less than \$100,000	2343					M.1.c.(1)
(2) Brokered deposits of \$100,000 through \$250,000 and certain brokered retirement deposit accounts	J472					M.1.c.(2)
d. Maturity data for brokered deposits:						
(1) Brokered deposits of less than \$100,000 with a remaining maturity of one year or less (included in Memorandum item 1.c.(1) above)	A243					M.1.d.(1)
(2) Brokered deposits of \$100,000 through \$250,000 with a remaining maturity of one year or less (included in Memorandum item 1.c.(2) above)	K219					M.1.d.(2)
(3) Brokered deposits of more than \$250,000 with a remaining maturity of one year or less (included in Memorandum item 1.b above)	K220					M.1.d.(3)
2. Components of total nontransaction accounts (sum of Memorandum items 2.a through 2.d must equal item 7, column C above):						
a. Savings deposits:						
(1) Money market deposit accounts (MMDAs)	6810					M.2.a.(1)
(2) Other savings deposits (excludes MMDAs)	0352					M.2.a.(2)
b. Total time deposits of less than \$100,000	6648					M.2.b.
c. Total time deposits of \$100,000 through \$250,000	J473					M.2.c.
d. Total time deposits of more than \$250,000	J474					M.2.d.
e. Individual Retirement Accounts (IRAs) and Keogh Plan accounts of \$100,000 or more included in Memorandum items 2.c and 2.d above	F233					M.2.e.

While we greatly appreciate the items that have been included on the proposed changes, in order for the RC-E changes to truly reduce our reporting burden, the above highlighted items would also need to be changed accordingly. Otherwise, we are still required to track the three separate levels of deposits (1 - under \$100,000, 2 - \$100,000 through \$250,000 and 3 - over \$250,000), which does not accomplish the intended goal.

Sincerely,

Ross Kerns