
MassMutual Trust Company, FSB

*A stock subsidiary of the
Massachusetts Mutual Life Insurance Company*

November 13, 2015

Legislative and 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

To The Office of the Comptroller of the Currency:

The MassMutual Trust Company, FSB ("MassMutual Trust", the "Company", "we", or "our") appreciates the opportunity to provide comments on "1557-0081, FFIEC 031 and FFIEC 041."

MassMutual Trust is a federally chartered trust company that provides fiduciary and related trust services to individuals, endowments, foundations, and employee benefit programs. MassMutual Trust does not operate in banking activities with the general public such as lending or deposit accounts, does not handle cash or cash equivalents, and does not accept correspondent accounts for foreign financial institutions or private banking accounts. It is a small financial institution with assets below \$100 million, which files the FFIEC041 Call Report.

We discuss below our feedback and recommendations to minimize the burden of FFIEC041 information collection on respondents.

Condensed Version of Call Report during interim periods

We believe for smaller banks with under \$500 million in assets that are well capitalized, a condensed version of the Call Report should be accepted for the first, second, and third quarterly filings. The full version should still be required for the year end reporting period. We believe that well capitalized should be defined according to a bank's year-end Call Report with ratios exceeding the Prompt Corrective Action "well capitalized" definition of 10% for the total risk based capital ratio, 8% for the tier 1 risk based capital ratio, 6.5% for the common equity tier 1 capital ratio, and 5% for the tier 1 leverage ratio. As an additional measure, we believe reported capital should equal 10% or more of reported assets.

For these banks, we recommend to exclude from the condensed version the following schedules: schedule RC-K Quarterly Averages, schedule RC-B Securities, and schedule RC-R Regulatory Capital.

These schedules require more time and effort to complete. It is also difficult to obtain the necessary information to complete these schedules.

Elimination of Custodial Bank Deduction Calculation for Banks with a Zero Limit

Schedule RC-O-Other Data for Deposit Insurance and FICO Assessments is used to gather data required to calculate the FDIC Assessment. We propose that line 11a Custodial Bank Deduction need not be calculated if line 11b Custodial Bank Deduction limit is zero. The limit caps the amount of the Custodial Bank Deduction that can be applied to the FDIC assessment. If the limit is zero, no amount can be deducted, and the Custodial Bank Deduction amount is irrelevant. Elimination of the requirement to calculate this amount in the event that the limit is zero, would eliminate unnecessary time and effort.

In summary, we thank the OCC, the Federal Reserve Board, and the FDIC and their staffs for working together in an effort to improve the reporting burden. We are happy to discuss any of our comments with you.

Sincerely,

A handwritten signature in cursive script that reads "Diane Quintero".

Diane Quintero
Comptroller