

**Satterfield, Kevin**

1557-0081

**From:** Ann Thomas [athomas@thomasconsult.net]**Sent:** Monday, June 14, 2010 4:45 PM**To:** Regs.Comments**Subject:** comment to proposed change to consolidated reports of condition and income

I think more guidance needs to be given on how banks are to compute the daily averages. Do the daily averages only include noninterest bearing accounts that maintain a daily balance of more than \$250,000 for each day of the quarter? Or is the average computed by taking the quarter to date average of the accounts that have a quarter end balance of \$250,000? Or is the average computed by taking the quarter to date average of any noninterest bearing account that is more than \$250,000 on any day during the quarter?

Accordingly, the agencies are proposing that the total dollar amount of TAG program-qualifying accounts and the total number of such accounts would be reported as an average daily balance rather than as a quarter-end amount beginning with the September 30, 2010, report date for the Call Report, the TFR, and the FFIEC 002. The amounts to be reported as daily averages would be the total dollar amount of the noninterest bearing transactions accounts, as defined in the April 2010 interim rule, of more than \$250,000 for each calendar day during the quarter divided by the number of calendar days in the quarter. For days that an office of the reporting institution is closed (e.g., Saturdays, Sundays, or holidays), the amounts outstanding from the previous business day would be used. The total number of accounts to be reported would be calculated on the same basis.

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