

November 23, 2010

Communications Division  
Office of the Comptroller of  
the Currency  
Public Information Room  
Mailstop 2-3  
250 E. Street, SW.,  
Washington, DC  
20219

RE: Proposed Agency Information Collection Activities Comment Request  
Federal Register / Vol. 75, No. 189 Thursday September 30, 2010  
OCC 1557-0081

Ladies and Gentlemen:

I appreciate the opportunity to comment on the proposed call report changes.

This requirement will place unnecessary burdens on community banks with the addition of a Memorandum Item to the Call Report which will have each bank estimate and record the amount of non-brokered deposits obtained through the use of the internet, deposit listing services and other automated services.

My main concern with this requirement is that it appears not to recognize any differences among listing services such as:

1. Not All Listing Services Serve the Same Types of Customers.
2. Not All Listing Service Deposits can be Easily Tracked and Controlled.
3. Not All Listing Services Represent a Source of High-yield Liquidity.
4. The Memorandum Change may Dissuade Further Examination.

This requirement will also lead to commingling of all non-brokered deposits from the various Internet-based and automated sources, because all these sources serve different types of customers. Commingling the many sources may lead examiners to assign a blanket high-risk, high volatility classification to the entire group, which would misrepresent a portion of the deposits.

In conclusion, I believe that adding the single Memorandum line item to the call report to identify deposits obtained through the use of the internet, deposit listing services and other automated services will only serve to advance inaccurate characterizations of these deposits and possibly cloud examiners' correct analysis and evaluation of the risk factors associated with a bank's depositor base. I think there

should be more promotion of education in regards to the differentiations among the types of listing services that are available to financial institutions. Furthermore, I think the focus should be on evaluating depositor characteristics and the banks' historical experience regarding rate comparisons and the ability to retain deposits at maturity.

Sincerely,

A handwritten signature in black ink that reads "Jeff Ramori". The signature is written in a cursive style with a large, stylized "J" and "R".

Jeff Ramori

Compliance Officer

First Community National Bank