

Proposal: FFIEC 031 AND 041 (ICP# 2010-17)  
Description: Joint agency proposals to extend and revise the Reports of Condition and Income FFIEC 031, for banks with domestic and foreign offices; FFIEC 041 for banks with domestic offices only.

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Comment ID: 55007  
From: First National Bank of the North, William P. Loew  
Subject: CALL REPORTS

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Comments:

To whom it may concern:

I wish to express deep concern over the proposed changes to the Call Report to become effective March 31, 2011. When is enough, enough? The current report is already 61 pages in length and requires a considerable amount of staff time and resources each quarter to complete. As a small community bank, we are concerned that additional reporting will require additional staffing, a cost that comes at a time when we are trying to build capital and reserves. This will place an even bigger strain on already lower than normal earnings!

Please consider that this is not the time to place additional burdens on community banks. Nor is it the time to tax an already lean staff to spend more time reporting to the government and less time serving our customers and doing tasks that may increase our profits.

Thank you for your consideration.

William P. Loew  
First National Bank of the North