
From: Jim Varney [jim@custerfederal.com]
Sent: Tuesday, February 08, 2011 1:15 PM
To: Comments, Infocollection
Subject: 1550-0023 (TFR: Conversion to Call Report)

In regard to the above, two concerns we have are the elimination of the CMR and elimination of the collection and publication of the cost of funds indices.

We rely heavily on the interest rate sensitivity report generated as a result of the CMR. Without the CMR there evidently will no longer be an interest rate sensitivity report. We urge reconsideration of this. We would be hard pressed to generate this detail and provide this level of expertise. We, as well as many others, rely on this information for our daily operation.

In regard to the cost of funds indices, there are numerous adjustable interest rate home loans including loans sold to FNMA and FHLMC that use these indices. We would think it may be difficult for consumers to agree on a substitution of indexes as the cost of fund indexes are generally considered to be a "lagging" index. It will be hard to replace that feature to the satisfaction of the consumer.

Thank you for your consideration.

Regards,

Custer Federal
by:

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