


## COMPTROLLER CORRESPONDENCE

Log Number: 2011-003

To: Jennifer Kelly

From:  Nancy Jones  
Executive Assistant to the Comptroller

Date: 03/07/2011

Subject: Letter from George W. Gilbert  
re: Notice to Discontinue OTS Thrift Financial Report Schedule  
CMR

Due back by: 03/15/2011

**ACTION/SPECIAL INSTRUCTIONS:** Please prepare a response for the Comptroller's signature and return it, plus this CONTROL SHEET to my office.

When returning a response to the Comptroller's office for signature, please include a redborder indicating reviewer's sign-offs.

If you are unable to respond to this letter promptly, please send an interim response to the correspondent to let them know that you have their letter and are looking into the matter. Be sure to include the contact's name and telephone number in your letter.

Return control sheet and response to Ann Taylor. (Mail Stop - 9-1/Telephone - (202) 874-4900).

**First Federal**  
**SAVINGS BANK**  
of Angola

RECEIVED

2011 MAR -7 AM 11:35

COMPTROLLER  
OF THE CURRENCY

212 East Maumee Street  
Angola, Indiana 46703  
260/665-7556  
www.ffsbangola.com

March 1, 2011

Mr. John Walsh  
Acting Comptroller of the Currency  
Administrator of National Banks  
Washington, DC 20219

RE: Your letter of February 22, 2011

Dear Mr. Walsh:

In regard to your subject letter, I wanted to thank you for providing the regional outreach meetings to help us all transition from the OTS into the OCC. As you mentioned in your letter, communication is vital to assure an orderly and effective change. Two of my officers will be attending the meeting in Indianapolis this Friday, March 4<sup>th</sup>.

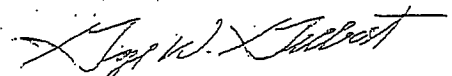
The OCC's Notice of Proposed Rulemaking dated February 3, 2011 detailed plans to convert from the TFR to the Call Report. We view this as a positive change. I'm sure it will be much less cumbersome when interpreting information submitted by both thrifts and banks.

We are very concerned, however, that the notice includes a provision to discontinue the OTS Thrift Financial Report Schedule CMR and the interest rate risk model. The interest rate risk calculation has been a mainstay of our interest rate risk program. So important, in fact, that a copy is included in our Directors' packets when our quarterly interest rate risk review is conducted. My Board relies heavily on these calculations and the easy to understand format in which they appear. Further, as a small institution, our IT system is unable to generate this type of information should the report be discontinued.

I would strongly recommend and respectfully ask that the interest rate risk model be continued by your office. I am sure it is as vital to other small thrifts as it has been to us over the years.

Thank you for your consideration.

Sincerely,



George W. Gilbert  
President

CC: Amy E. Ross, Senior Vice President  
Scott G. Gruener, Vice President  
Susan R. Allshouse, Compliance Officer/Auditor

"Locally Owned and Operated Since 1933"  
Member FDIC