

Proposal: FFIEC 0031 & 0041 (ICP #13-5; pub'd 2/21/13)

Description: Joint proposal with the FDIC and OCC to extend and revise the Consolidated Reports of Condition and Income (Call Reports). The proposed new data items and the revisions of some existing data items will take effect as of the June 30, 2013, report date, except for one proposed new data item that would be added to the Call Report effective December 31, 2013.

Comment ID: 111031

From: EQUITY BANK, Bruce Benyshek

Proposal:

Subject: Call Reports for banks and savings associations with (FFIEC 031) and without domestic and foreign of

Comments:

RE: The addition of proposed new data items and proposed revisions, to take effect as of the June 30, 2013 report date, for call report schedules RC-E Deposits and RI Memorandum, that would require tracking of all account-based revenues, such as NSF, service charges, ATM charges, and debit card charges, by consumer vs. business.

We do not have the existing data or systems to adequately track this information so will require more time for development. Thus, we request that these proposed changes to not become effective on the proposed date, if at all, but at a later time.

Thank you for your consideration.

Bruce Benyshek, CPA, CVA, CMAP, CGMA | EVP/CFO
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