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Sent: Monday, March 11, 2013 9:06 AM
To: Comments
Cc: Thomas P. Abelman
Subject: Consolidated Reports of Condition and Income, 3064-0052

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We wish to comment on the proposed changes in Call Report requirements and in particular on one specific aspect (new Memoranda Item 15) of the just published (Fed 21, 2013) Call Report proposal.

In general, we have no issues with the proposals save in that one specific area, however in that area we feel that the proposal is entirely unrealistic as to the type of data required versus current data processing requirements and configurations. We speak of the following proposal:

For all institutions that offer separate products, a new breakdown on the year-to-date amounts of certain types of service charges on consumer deposit accounts reported as noninterest income in Schedule RI, Income Statement.

We note that the proposal states that:

However, the FFIEC and the agencies recognize that internal accounting and recordkeeping practices may vary across institutions and that disaggregating all types of fees could be burdensome on smaller institutions. Because the FFIEC and the agencies believe that overdraft-related, monthly maintenance, and ATM fees are of most immediate concern to supervisors and policymakers, this proposal calls for the separation of these consumer deposit service charges only.

Despite this assertion, the FFIEC and Agencies seem not to realize that financial institution systems are not inherently programmed or configured to capture such disaggregated data at the level of detail requested, and even if it is possible to reconfigure the necessary software (some systems may not even support the need without programming changes), it would generally NOT be possible to do so "retroactively" to January 1, 2013. This makes the request impractical and unreasonable as offered. We would respectfully request that the implementation requirement be implemented only "prospectively" and after such a time as financial institutions have had an opportunity to reconfigure systems. For those financial institutions who might need to reprogram systems to capture such data, we would propose that such institutions be allowed to certify that reprogramming is required, and provide "estimated" data for at least one year from the effective date in order to allow adequate time for reprogramming. If earlier application (immediate) is mandated, we would request that at least 2013 data be "estimated" until financial institutions have had an opportunity to begin the process of gathering the necessary data.

Thank you

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