
From: Kyle A. Campbell <Kyle.Campbell@bankwithastra.com>
Sent: Monday, March 18, 2013 5:29 PM
To: Comments
Subject: February 21, 2013 - Consolidated Reports of Condition and Income, 3064-0052

To Whom It May Concern:

Astra Bank is a \$270 million bank serving seven communities in rural Kansas and rural Nebraska. We provide a wide array of products and services to consumers and non-consumers including deposit products. While we do have appropriate systems in place to offer these products and services to our customers in a manner that meets or exceeds their needs and complies with all applicable regulation, these systems do not have the capability to disaggregate the service charge income dependent upon whether the bank's customer is a consumer or a non-consumer. To disaggregate the data reported in Schedule RI, Item 5b would require a significant amount of manual effort, and, even with such a significant expenditure of effort, is highly likely to result in the reporting of data of questionable accuracy. The key limitation to the bank's ability to comply with this request, especially by the proposed implementation of June 30, 2013, is the capability of the bank's data processing software. As Astra Bank is not a sufficiently large bank to have its own proprietary data processing software, the bank is at the mercy of its data processing vendor to make the necessary changes to comply with this proposed change.

If this proposed change is enacted, it is likely that the bank's data processor will be able to provide the necessary information to the bank for its successful completion of the proposed new items in the Call Report. However, the changes necessary on the data processor's end will come at a cost. Those costs will be passed on to the banks that are customers of the data processor, including Astra Bank. Astra Bank will then be placed in a position where it looks for opportunities to recoup this added expense from its customers – both consumer and non-consumer. It is hopeful that those who have proposed this change to the Call Report have considered this and have determined that the resultant data is of sufficient value to necessitate additional costs on the customers of the banking industry.

Astra Bank appreciates the opportunity given to present its comments on the proposed changes.

Sincerely,

Kyle A. Campbell, President & CEO



Deep Roots. Deeper Commitment.

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