

The Gunnison Bank

From: Dianne Haberman [mailto:dhaberman@gunnisonbank.com]

Sent: Monday, October 29, 2007 6:11 PM

To: Comments

Cc: Haberman, Dianne; "Burt, Ashley"@mail.gunnisonbank.com Subject: Consolidated Reports of Condition and Income, 3064-0052

Comments regarding proposed call report changes:

#II.B.5- Mortgage repurchases and indemnifications.

Indemnification sometimes includes only reimbursement of attorney's fees and other expenses incurred in fixing the problems on loan paperwork. Is this type of indemnification to be included in the Schedule P reporting? Clarification needs to be added to say that reportable indemnification consists only of indemnification that approximates the repurchase price of the loan.

#II.E.-Revision of Reporting Threshhold for Other Noninterest income and Other Noninterest Expense in the Call report.

The other noninterest expense captions of (a) ATM and interchange expenses (b) telecommunications expenses pose a problem for our bank which uses several third party vendors. These vendors provide a wide variety of services for us including those in (a) and (b) above. It would be very cumbersome to split out every invoice by type of charge for reporting purposes. In addition, telecommunication expenses would need to be defined. Does it include cable line fees? Does it include web page maintenance?

Thank you for your attention.

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