From:	Collin Cook
To:	Regs.Comments
Subject:	[EXTERNAL] FFIEC 031-051
Date:	Friday, November 03, 2017 5:11:43 PM
Attachments:	image001.png

Although not in the proposed rules changes, consideration should be given to eliminating the $100,000 deposit categories on RC-E, Memorandum 2. b., 2.c. and 2.e. and just go with a single $250,000 break point.

Schedule RC-E—Continued

Memoranda—Continued

Dollar Amounts in Thousands	RCON	
2. Components of total nontransaction accounts (sum of Memorandum items 2.a through 2.d must equal item 7, column C above):		
a. Savings deposits:		
(1) Money market deposit accounts (MMDAs)	6810	
(2) Other savings deposits (excludes MMDAs)	0352	
b. Total time deposits of less than $100,000	6648	
c. Total time deposits of $100,000 through $250,000	J473	
d. Total time deposits of more than $250,000	J474	
e. Individual Retirement Accounts (IRAs) and Keogh Plan accounts of $100,000 or more included in Memorandum items 2.c and 2.d above	F233	
3. Maturity and repricing data for time deposits of $250,000 or less:		

Thank you for your consideration.

Collin Cook, CFO
Luana Savings Bank
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