

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 | |

Thank you for your consideration.

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