From: Carla Jaen

Proposal: FFIEC 002, 002S (ICP-2017-30; Pub'd 12/17/17)

Subject: FFIEC 002, 002S,

Comments:

Good afternoon,

We would like to inquire on the following upcoming proposed change to form FFIEC 002, page 7, under schedule RAL, memoranda section, line M.17. It is proposed to modify the statements that describe the most comprehensive level of auditing work performed for the branch or agency. It has come to our attention that Line 1 will be broken into 1.a & 1.b. Under line 1.a, the proposal is to give the option to select an integrated audit of the branch and its internal control over financial reporting. It is our understanding that only public companies and companies with a market capitalization greater than 75M are required to have an integrated audit.

Thank you. Carla Jaen