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December 11, 2014

The Honorable Thomas Curry  
Chairman of the Federal Financial Institutions Examination Council  
Office of the Comptroller of the Currency  
400 7<sup>th</sup> Street, SW  
Washington, DC 20219

Re: Call Report Burden

Dear Comptroller Curry:

ICBA understands from Bob Storch's report to the FDIC Advisory Committee on Community Banking last month that the FFIEC Call Report Task Force will be making a number of recommendations to FFIEC for reducing the call report burden for community banks. ICBA appreciates the work that the Task Force has done so far on this important issue and we hope that the FFIEC will seriously consider adopting our proposal for a short form call report.

As we have pointed out in the past, having the smallest community banks provide an extensive level of financial information with the same specificity as the largest megabanks every quarter represents a significant burden on community bank call report preparers. Establishing a short-form call report with basic schedules such as the income statement, balance sheet, and changes in shareholders' equity in the first and third quarters for those banks that are well managed and well capitalized will reduce the time required to meet call reporting obligations and will assist in reducing the overall regulatory burden faced by community banks.

If members of the FFIEC Task Force would like to personally observe the amount of community bank manual work that goes into call report preparation, ICBA would be glad to assist with the coordination of those visits. Again, thank you for the work that FFIEC and its Task Force has done so far and we look forward to FFIEC adopting some concrete proposals by early next year for reducing community bank call report burden.

Sincerely,  
/s/ Christopher Cole  
Christopher Cole  
Executive Vice President and Senior Regulatory Counsel

*The Nation's Voice for Community Banks.®*

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