



December 7, 2007

Regulation Comments
Office of Thrift Supervision
Attention: Call Conversion OTS-2007-0023
1700 G Street NW
Washington, DC 20552

Dear Sir or Madam,

The purpose of this letter is to provide comments requested by OTS Advance Notice of Proposed Rulemaking OTS-2007-0023. I believe the proposed change to a call report from the currently required TFR would be beneficial change. The comparisons possible among the different institutions would provide a great tool for making more informed decisions. Peer group analysis would be more meaningful, complete and accurate if this change is adopted. Also, the use of a single reporting format across financial institutions would allow personnel with bank experience to work at a thrift without learning a complete new system and vice versa.

The biggest opposing factor to this change I believe will be time and cost in implementing this change for the first cycle. The learning curve for implementation in preparing the first call report will be significant. After the first cycle, I believe that preparation time for completing the call report will be the same, if not less then completing the TFR. I think that the OTS can do two things that would help tremendously in making the transition easier on affected savings banks. The first would be to publish a type of "cross reference" document that outlines where certain lines and sections of the TFR would appear in the call report. It would also highlight the major differences between the two, and describe any information required in the call report that was not required in the TFR in great detail. The second thing that could be done to ease the transition is to get rid of the Consolidated Maturity Rate (CMR) data that is required. This is the most tedious, time consuming aspect of the TFR, and in my opinion not very useful. The cost (in time and employee resources) greatly exceeds the benefit (information derived) from the preparation of this schedule. If the OTS institutes the change to the call report, I believe it should be done fully, not change to the call report and still require the CMR. The time saved from not having to prepare the CMR would offset the additional time required to prepare the first call report.

In summary I, and the management of Bayside Savings Bank, support the move to the call report system from the TFR system. I also think that given the right help and sufficient time from the OTS, that this change can be made without significant adverse consequences. Thank you for the invitation to submit a comment on this issue.

Sincerely,

Brian M. Courtney, CFO
Bayside Savings Bank