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Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552

Attention: OTS-2007-0023
<http://www.regulations.gov>

RE: COMMENT REQUEST – INFORMATION NEEDED TO RESPOND TO A
PROPOSAL TO CONVERT FROM THE THRIFT FINANCIAL REPORT (TFR)
TO THE CALL REPORT

Dear Sir or Madam:

On November 14, 2007 the Office of Thrift Supervision (OTS) published an Advance Notice of Proposed Rulemaking (ANPR). The ANPR requests comments identifying information that would be helpful in analyzing a proposal to require savings associations to file quarterly Consolidated Reports of Condition and Income (Call Reports) instead of Thrift Financial Reports. People's United Bank strongly supports the OTS' planned proposal to convert from use of the TFR to the Call Report and believes that the following information would be helpful in evaluating such a proposal.

Benefits of Call Report. We believe the most important benefit of the proposed change is the increased comparability that a single form of regulatory report will provide the banking industry. Steps taken to "level the playing field" and allow for more meaningful comparisons by regulators and other interested parties on an institution-by-institution basis (whether thrift or commercial bank) should be viewed by all as a favorable development. For these reasons, we believe the OTS' proposal should elaborate on the benefits of such a change, including improved analysis of peer group results, trends, etc.

Report Differences. We believe it is important for the OTS to highlight within its proposal, in sufficient detail, the primary technical reporting differences between the TFR and the Call Report. We assume that key elements of the TFR will be carried over into the Call Report serving to embrace the "best" of each reporting form. A description of such proposed conforming changes, if any, will be helpful to constituents as they evaluate their ability to comply with new reporting requirements in an effective and efficient manner.

XBRL. The adoption, in October 2005, of XBRL (Extensible Business Reporting Language) standards for Call Report data was a significant achievement and one that should not be overlooked. In addition to being aligned with the SEC's longer-term objective of requiring use of XBRL by all publicly traded registrants, the banking industry's early adoption of this technology with respect to Call Report filings has made key business and financial data

available, via the Internet, for public use and analysis, serving to benefit management, regulators, investors and analysts alike. With the continuing trend toward globalization, including the current requirement by some regulators in China, Spain, The Netherlands and the United Kingdom to use XBRL, it is imperative that the U.S. and, more specifically, the banking industry do not lose ground in this movement.

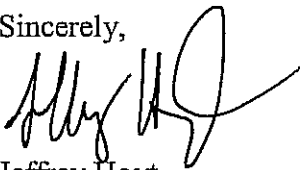
Internal Costs. We understand that costs will be a very important concern to institutions contemplating a change to the Call Report. Thus, we believe it would be helpful if the OTS were to provide an estimate of the man-hours believed to be required in order to make the change from reporting via the TFR to the Call Report. Obviously, the impact will vary from institution to institution but an estimate (or better understanding) of the necessary resource commitment will better enable institutions to evaluate the cost-benefit of the proposed change.

Consulting Costs. In addition to the human resource cost referred to above, some institutions may incur additional consulting costs associated with system modifications, enhancements, and/or implementations in order to provide the information required by the Call Report. Again, the impact will vary from institution to institution but an estimate (or better understanding) of the cost to conform an institution's infrastructure will better enable an evaluation of the cost-benefit of the proposed change.

Effective Date. We believe an important factor in evaluating any proposed rule will be when implementation of the change would be required and/or permitted. Providing institutions with more clarity as to the OTS' proposed timeline as well as providing institutions the option to "early adopt" in their use of the Call Report would be viewed favorably.

People's United Bank believes that the benefits of changing to the Call Report will be significant and enthusiastically supports this proposed change. We thank you for the opportunity to provide our thoughts concerning what information would be valuable in analyzing this impending proposal and look forward to the publication of the notice of proposed rulemaking.

Sincerely,



Jeffrey Hoyt
Senior Vice President & Controller
People's United Bank