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To: CallReport

Subject: TFR to Call Report - OTS-2007-0023

- We believe that converting from the TFR to the Call Report will make it easier to compare and analyze bank and thrift information using the same reporting standards.
- Our core processor's software is designed to work with Call Reports and not TFRs which requires our accounting personnel to examine the output more closely on a quarterly basis to ensure accuracy before submission.
- The Call Report includes year-to-date net income instead of quarterly income and provides more useful information.
- We would also encourage elimination of the CMR since most financial institutions use third party ALM software that provides accurate information for managing interest rate risk.

Thank you for your consideration of these points.

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