



Regulation Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G Street, NW  
Washington, DC 20552  
Attention: OTS-2007-0023

Re: Information Needed to Respond to a Proposal to Convert From the Thrift Financial Report to the Call Report  
72 FR 64003 November 14, 2007

The Indiana Bankers Association (IBA) appreciates the opportunity to comment on the Office of Thrift Supervision's (OTS) Advance Notice of Proposed Rulemaking (ANPR) regarding the conversion of the Thrift Financial Report (TFR) to the Consolidated Report of Condition and Income (Call Report). We commend OTS for exploring the conversion and for seeking ways to make regulatory supervision work better.

IBA supports the OTS proposal to seek additional information from banks about a possible conversion from the TFR to the Call Report and urges OTS to move forward with the process by issuing a proposed rule for comment. We believe the conversion would reflect the diversification in the balance sheets of thrifts that has taken place and make it easier for thrifts to compare themselves with their competitors and peers. It also will provide greater transparency for investors and consumers.

The conversion from the TFR to the Call Report also would help thrifts, because the Call Report is supported by a broader range of service providers and filing software. There also are more training opportunities available for employees related to the Call Report.

#### Proposed Rule Should Eliminate Requirement to File the CMR

OTS has suggested that converting from the TFR to a Call Report could lower the cost of filing quarterly financial data. IBA agrees that lowering costs should be a major goal of the conversion and asks OTS to make every effort to assure that rules governing the conversion process do not add to costs for savings institutions in the long term. Thrifts will be facing substantial temporary increases in costs as they acquire new software, modify systems and train employees on Call Report requirements.

In the ANPR and a Memorandum, OTS has suggested that it will continue to require thrifts to file the Consolidated Maturity/Rate Schedule (CMR) as an addendum to the Call Report. We believe that continuing the requirement to file the CMR will add unnecessary costs to the Call Report filing and diminish the value of converting to the Call Report. Therefore, IBA urges OTS to eliminate the filing of the CMR under the new Call Report regime. Many thrifts have other

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No man has a moral right to withhold his support from an organization that is striving to improve conditions within his sphere."  
— President Theodore Roosevelt, 1908



software or use third-party asset-liability models that make similar calculations and that are less burdensome and labor-intensive to use.

#### OTS Should Provide Sufficient Lead Time for Transition

OTS should provide a detailed description of how it envisions the transition from the TFR to the Call Report in its proposed rule. Thrifts have indicated that they will need a substantial lead time to implement the conversion and test new systems. It will be necessary to acquire new software and to train employees on how to file the Call Report. OTS should provide information on the lead time for conversion, whether OTS or another government entity will provide training and technical assistance during the conversion process, and whether OTS has discussed with software vendors the need to provide added data items that OTS may require and that are unique to thrifts.

#### OTS Should Provide Information in a Proposed Rule to Help Savings Associations Evaluate the Conversion Proposal

In a proposed rule, OTS should provide detailed information on the differences between the TFR and Call Report and specify what parts of the TFR would continue to be required as an addendum or added to the Call Report. It would be extremely helpful if OTS would provide a conversion table identifying which TRF schedules match Call Report schedules. OTS also should provide an evaluation and comparison of costs of software packages for the TFR and Call Report. A comparison of estimates of the time required to prepare the TFR *vs.* the Call Report also would help savings associations evaluate the proposal.

Again, IBA applauds OTS for its initiative to gather information to determine whether to make the conversion from the TFR to the Call Report and will look forward to reviewing a proposed rule when it is issued. While we support this endeavor, IBA also supports diversity of charter types and the federal and state system that now exists. We would not support this as the first step in consolidation of charter types and regulators.

We appreciate the opportunity to comment on the ANPR and your consideration of our comments.

Sincerely,

S. Joe DeHaven  
President and CEO

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