

# **SOUTH**Bank

118 Jefferson Street  
Huntsville, AL 35801

www.southbk.com  
(256) 535-6000

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

To Whom It May Concern:

I think it is a great idea for the OTS to convert from the TFR to the Call Report and our staff encourages the change. This will make it easier to compare or analyze banks and thrifts. The Uniform Bank Performance Report is great for comparing banks and would allow the same easy comparison for thrifts and banks.

Prior to working for a thrift, I worked eleven years for a commercial bank and found the Call Report much easier to prepare than the TFR. The Call Report includes year to date net income instead of quarterly income and provides more useful information. Our core processor software is designed to work with Call Reports and not TFRs, making it more difficult to prepare a TFR.

We would also welcome abolishing the CMR. Most thrifts now have sophisticated ALM software that provides accurate information for managing interest rate risk. This software provides information equal to or better than the CMR, making the CMR a redundant report.

Please make this change so that banks and thrifts will be on the same level for purposes of comparison and analysis.

Sincerely,



Jeffrey D. Brown, CPA  
Senior Vice President and  
Chief Financial Officer