



December 18, 2007

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

Dear Sir or Madam,

We appreciate the opportunity to comment on the proposed rulemaking concerning the conversion of TFR reporting format to that of the Call Report.

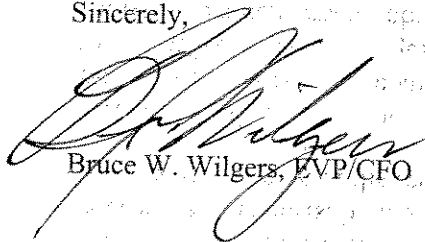
We understand that such conversion has the potential for making the financial information of the various reporting institutions more comparable. Additionally such reporting consolidation may facilitate the combination of the authoritative regulatory agencies and result in staff reductions and reduced training costs, both to the benefit of lower regulatory costs leading to the potential for reduced examination expense of the regulated institutions.

Such conversion does not come without challenges and increased costs, at least initially. The transitional challenge of converting the TFR schedules SC & SO to the corresponding Call Report schedules RC & RI will require substantial general ledger remapping time. If the regulatory agencies can provide a conversion table that identifies which TFR schedule codes are equivalent to Call Report schedules, this concern could be partially abated. Additionally, we will have to purchase (at currently unknown cost) Call Report input software to submit the data electronically and securely to the regulator and incur the training necessary to operate and maintain the software. Currently, the Call Report does not accumulate "CMR" type data. Maintenance of the CMR separate from the Call Report compounded with the shortened CMR reporting time frame would be a tough hurdle. We suggest that the CMR is unnecessary given the duplicative reporting of other internal A/L software.

We estimate that we would need at least 6 months to complete the conversion and would prefer longer in order to insure maintenance of our superior documentation and reporting record with the TFR/CMR.

In conclusion, absent the incentive of elimination of the CMR, we would not be supportive of the conversion.

Sincerely,



Bruce W. Wilgers, EVP/CFO