

OTS-2007-0023-DRAFT-0020[1].txt

Comment Info: =====

General Comment: This comment is in regards to the possible change from a TFR to a call report format (OTS-2007-0023). We do not believe we at Bank @LANTEC will benefit enough from the change to justify the additional time and expense to convert to a call report format. The biggest benefit we see is the ability to compare ourselves to other bank types. Ratio analysis can already be easily derived via the FDIC website. Our main objection to this proposal is that it will require additional expense with our core processor to facilitate the change as well as significant staff time to implement and train. At the same time, it seems that the burdensome CMR would still be required which means essentially a valueless proposition for the bank to change to a call report with very little reduction in current requirements. In summary, we do support the change.

Also, we believe the OTS should continue to differentiate itself in regards to the core purpose of the charter which is mortgage lending. This could possibly be another step that makes it that much easier to consolidate the regulatory bodies.

Thank you for providing us the opportunity to comment.

Susan Ralston
President/CEO
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