

January 14, 2008



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

RE: OTS-2007-0023

Dear Sir or Madam:

Washington Mutual ("WaMu") is pleased to submit this letter in response to a recent request for comment by the Office of Thrift Supervision ("OTS") regarding information needed to consider a proposal that would convert the Thrift Financial Report ("TFR") to the Consolidated Reports of Condition and Income ("Call Report").

WaMu supports the OTS's initiative to explore the possibility of converting its quarterly financial report from the TFR to the Call Report. As a large U.S. financial institution, WaMu is often compared with large U.S. commercial banks that file Call Reports. By providing banking and thrift institutions with a standard regulatory financial reporting format, WaMu believes that such a conversion would be beneficial to analysts and external readers, as current reporting disparities between the two reports would be eliminated. This would also lead to more effective peer analysis among U.S. depository institutions. WaMu also believes that the proposed conversion is an important step towards the banking agencies' long-stated goal of consistency in financial reporting between banks, bank holding companies, and thrifts. We believe that all U.S. depository institutions should be subject to the same financial reporting rules and regulations.

WaMu believes additional staff time will be required in order to plan and test for any conversion. This time will include systems conversions, training, instruction review, vendor appraisal, and testing. Accordingly, we believe that if the conversion takes place, sufficient time should be allowed for planning and testing.



If the OTS proceeds with this proposal, WaMu believes the OTS should address how to retain various forms of its interpretive reporting guidance provided for the TFR, for which no comparative guidance exists for the Call Report. In particular, we believe the Q&A supplement that clarifies TFR reporting issues should be preserved.

Additionally, if the OTS determines that adopting a Call Report model will necessitate the revision of certain regulations, we would respectfully request that such revisions be subjected to the due process of public commentary by publishing them in a Notice of Proposed Rulemaking.

We hope that the OTS will find these comments useful and would be pleased to discuss our views with members of the OTS staff at their convenience.

Very truly yours,

A handwritten signature in cursive script that reads "Tony Goulart, III".

Tony Goulart, III
Senior Vice President & Director of
Financial Reporting