



January 14, 2008

Information Collection Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, N.W.
Washington, D.C. 20552
Submitted via Federal eRulemaking Portal

Re: Proposal to Convert from the Thrift Financial Report (TFR) to the Call Report
Notice and Request for Comment
Docket ID OTS-2007-0023

Ladies and Gentlemen:

Wachovia Corporation appreciates the opportunity to comment on the proposed revisions (the "Proposal") to the Thrift Financial Report (the "TFR"). Wachovia Corporation is the fourth largest bank holding company in the United States based on assets. We offer full financial services in twenty-one states and are active globally in more than forty international offices. Our holding company owns directly or indirectly, four national banks and three thrift institutions.

We strongly support revising the TFR to mirror the Call Report format. By synchronizing the two reports, it will allow greater efficiency at companies such as Wachovia who have multiple deposit taking institutions. Having one set of regulations will greatly streamline the quarterly reporting process. For example, data which is collected to populate the TFR could be used to also populate the applicable portions of the FR Y-9C. Currently, much of the thrift data collected for the TFR must be rebuilt to fit into the Call Report format when compiling the FR Y-9C. Retro-fitting this data into a different format leads to a more time consuming process.

We also believe converting the TFR to a Call Report format will allow for greater comparisons among deposit taking institutions and limit confusion in the industry. Users of this information will only have one set of reports to both understand and compare.

Thank you for the opportunity to share our views on this matter.

Sincerely,

Jennifer L. Cassidy
Director of Regulatory Reporting
Senior Vice President

cc (by electronic mail):

Peter M. Carlson, Corporate Controller
Carol Pulford, Corporate Accounting and Reporting– World Savings
Laura Hearick, Examiner-in-Charge, Office of Thrift Supervision
Dave Wilson, Examiner-in-Charge, Office of the Comptroller of Currency
Richard Westerkamp, Central Point-of-Contact, Federal Reserve Bank of Richmond