
From: Rob Nelson [rnelson@hydeparkcoop.com]
Sent: Monday, November 19, 2007 12:27 PM
To: CallReport
Subject: Conversion to the Quarterly Call Report

I am responding to the proposal to have OTS regulated Banks change from the TFR Report to the Call Report. I realize that in terms of comparability it might be easier to have just one type of quarterly report, the Call Report, but outside of that I'm not sure there are enough benefits to warrant the change at this time. First of all OTS staff and OTS regulated Banks would have to go through a significant training period in order to be prepared for this change. Also systems both at the OTS and at the Banks would have to be totally rewritten to accommodate these changes, which would be costly and time consuming. Banks would also have to purchase software from an outside vendor, which would be a cost to the banks that they presently don't have. Next FDIC and OTS banks are still able to compare each other through a number of Analysis Services (IDC for example), since most common measures of financial strength are the same. Finally, what would happen to the CMR report? Wouldn't it have to be changed too or would it be eliminated, since the totals on both reports must agree?

I think that before the OTS moves forward on this proposal, more time should be spent looking at the effect to the OTS and its member banks, since it could be significant. Thank you for taking my comments into consideration.

Sincerely,

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