



# SPRATT SAVINGS AND LOAN

*Your Community Bank Since 1892*

January 4, 2007

Regulation Comments  
Office of Thrift Supervision  
Attention: Call Conversion OTS-2007-0023  
1700 G Street NW  
Washington, DC 20552

Dear Sir or Madam,

This letter is our response to your request for comments relating to the OTS Advance Notice of Proposed Rulemaking OTS-2007-0023. We have had the benefit of reviewing many of the responses you have received and posted on your web site. It appears from a cursory review of those responses that a majority favors the proposed change to the Call Report from the TFR. We would also support this change for the same reasons specified on practically all of the responses. While some investment in time and cost would be required to implement this change, the benefits would appear to be warranted.

We have also observed some responders calling for the elimination of the Consolidate Maturity Rate (CMR) report. We are a small mutual savings and loan. Due to our size, we have relied upon and effectively utilized the CMR report. Unlike most larger financial institutions, we do not have an internal Asset/Liability model. We therefore encourage the inclusion of the CMR model (or some edited version) with the shift to the Call Report. Perhaps the CMR piece could be optional, available for those who wanted to utilize it but not imposed on all institutions.

Our proposal represents what would be in our own best interest, however we think that by making the CMR reporting optional this proposal would be fair and equitable to all.

Thank you for the opportunity to provide our views on this important issue.

Sincerely,

J. Glenn Anderson  
CEO

MAIN OFFICE  
121 Saluda Street  
P. O. Box 579  
Chester, SC 29706  
Telephone (803) 385-5102  
Fax (803) 581-2060

GREAT FALLS BRANCH  
800 Dearborn Street  
P. O. Box 306  
Great Falls, SC 29055  
Telephone (803) 482-2156