Comment Info: =================

General Comment:While the advantages of converting to the Call Report for the agency (reduced cost) and the industry (better comparison of data among all depository financial institutions) are obvious, there are a number of issues that need to be considered before proposing this change.

The change will require significant training time, including time to convert or revise processes and automated procedures already established for TFR completion. The TFR also allows the industry and the agency better data to determine and monitor compliance with thrift-related percentage of asset and capital limitations. The time necessary for these changes should not be underestimated. Also, it should be recognized that the industry will still need to continue to track its statutory limitations and this may involve separate tracking mechanisms and increase regulatory burden.

Conversion to the Call Report will also preclude comparison of certain data to prior

reported data given the significant difference between the reports, including year-to -date vs. period income statements. The fact that banks use calendar year end as their fiscal year end vs. thrifts which utilize differing fiscal year ends should

also be considered.

With regard to specific schedule differences, we support the continuation of the CMR and do not object to the continuation of schedule HC. Schedule VA may raise some more interesting questions as thrifts are authorized to establish specific valuation allowances for partial write-downs or ?Loss" classifications while commercial banks utilize the write down methodology for "Loss" classifications. The way delinquencies are calculated per Schedule PD (e.g., payments missed vs. actual days) should also be compared to Call Report instructions

Thank you for your consideration of these issues.

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