

OTS-2007-0023-DRAFT-0018[1].txt

Comment Info: =====

General Comment:I fully support the move from the TFR to the FDIC Call Report for the same reasons that other supporters have given, such as the ability to compare our bank with other institutions using the same reporting standards. Of course there would be a learning curve associated with this change, however this comes with any change.

I would strongly suggest the elimination of the CMR report if this change is approved. I believe that most, if not all banks, have some sort of Asset/Liability model in house or outsourced that already provides the sensitivity information. This report is very cumbersome to complete and provides the same information that we already get out of the ALCO model.