

INDEPENDENCE TRUST COMPANY

November 21, 2007

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
Attention: OTS-2007-0023
1700 G Street, N.W.
Washington, DC 20552

Re: Comments on OTS-2007-0023 Possible Conversion to the Call Report (of the TFR)

Dear Sir or Madam:

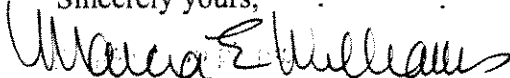
We have read with interest your memo of November 13, 2007 announcing possible conversion to the call report, soliciting comments and providing a copy of the advanced notice of proposed rulemaking.

We are a small, private, trust-only institution and believe the burden of this proposed change falls on us while the benefits accrue to other parties. Consider the benefits listed in the memo by turn:

- **Better peer comparisons.** There is such a limited number of trust-only institutions, this is not of benefit to us.
- **Lowers cost of filing.** For our firm the proposed change imposes a financial consequence on us, requiring us to purchase new software and train staff on its use. Currently we use OTS-provided software and staff is already knowledgeable about how to complete it. Moreover, given the number of firms offering call report software, there is a research burden in simply selecting a provider.
- **Call report data is already available on the FDIC website including public version of the Uniform Bank Performance Report (UBPR).** This appears to be similar to better peer comparisons; see our comments on that above.
- **Investment analysts could use UBPR for banks and thrifts.** As a private company, we are not covered by investment analysts.

We understand that the unique nature of our business may put us out of step with other OTS regulated institutions on this matter and appreciate the opportunity to voice our comments. Thank you.

Sincerely yours,



Marcia E. Williams
President

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