

Comment Info: =====

General Comment: Conversion to the Call Report

We wholeheartedly endorse this change and feel it is a good first step in establishing consistency in quarterly reporting among the regulators. We feel that using the current Call Report publications and instructions make the most sense. This will be more efficient for the OTS and the banks by not having to come up with your own version of these documents.

This conversion should also include deleting the requirement of completing the cash flow report and the extremely labor intensive CMR report. The OTS is the only regulator that requires the CMR and most of the information needs to be computed by hand. It would seem to me that most, if not all banks, have ALM software modules in-house or engage a consultant to perform ALCO simulations including the TB 13-A calculations. The OTS CMR report is redundant and unnecessary. If the OTS is really serious about making changes beneficial to its savings associations it supervises, it needs to adopt the entire current reporting requirements of banks that complete the Call Report.

Thank you for your time.