

From: Neil Stanley [nstanley@northwestfederal.com]

Sent: Wednesday, December 12, 2007 12:45 PM

To: CallReport

Subject: Proposal to Convert from the Thrift Financial Report (TFR) to the Consolidation Reports of Condition and Income (Call Report)

Office of Thrift Supervision

Attention: Call Conversion

1700 G Street N W

Washington, DC 20522

We concur with the comments of Director Reich in his CEO Memo # 264 dated November 13, 2007.

- Our Bank routinely compares ourselves to peers and competitors. The Bank's balance sheet more closely aligned with commercial banks rather than thrifts. Therefore, peer analysis using the UTPR report is not meaningful, whereas the UBPR would provide enhanced comparable data.
- Conversion to the call report format would greatly reduce the Bank's preparation time for quarterly reporting. Our thrift is a wholly owned subsidiary of a bank holding company regulated by the Federal Reserve. The Bank's software provider does not presently have applications to assist with the preparation of the TFR. Consequently, the Bank's preparer quarterly prepares the TFR manually for each "**quarter**" and the "**year to date**" reclassified information for the Federal Reserve Y-9. The Bank's IT provider has a Call Report application which would greatly improve the Bank's regulatory reporting burden.
- The Call Report format for thrifts would improve the public's ability to compare banks utilizing the FDIC website. Currently the TFR and Call Report do not provide comparable data for loans or deposits.

We also concur with the agencies recommendation to continue the collection of detailed maturity and rate data. The Net Portfolio Value (NPV) Model is an excellent model for measuring interest rate risk (IRR). The model provides the Bank and the agency with comparable information to measure IRR across the entire thrift industry.

Therefore, Northwest Federal Savings Bank strongly indorses the conversion to the Consolidation Reports of Condition and Income (Call Report)

Sincerely,

Neil Stanley

CEO

Northwest Federal Savings Bank

101 West 5th Street

Spencer, Iowa 51301

(712)580-4147

nstanley@northwestfederal.com

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