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January 14, 2008

Regulation Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552

Attention: OTS-2007-0023

Dear Sir or Madame:

The Independent Community Bankers of America (ICBA)¹ welcomes the opportunity to comment on the Office of Thrift Supervision's Advance Notice of Proposed Rulemaking regarding the potential conversion of the Thrift Financial Report (TFR) to the Call Report.

If the OTS were to go forward and convert the TFR to the Call Report, savings associations would no longer be required to file the TFR, but instead would file a Call Report. However, savings associations would be required to continue filing certain information currently collected on the TFR that is not included on the Call Report. This additional information would include the Consolidated Maturity Rate data (Schedule CMR) and the Holding Company data (Schedule HC). It is anticipated that this additional information would be filed as schedules of the Call Report. If it can not be filed in this manner, it would be filed directly with the OTS.

ICBA Views

ICBA supports the efforts by the OTS to explore the conversion of the TFR to the Call Report. While not all OTS supervised institutions support the change, we believe that the

¹ *The Independent Community Bankers of America represents 5,000 community banks of all sizes and charter types throughout the United States and is dedicated exclusively to representing the interests of the community banking industry and the communities and customers we serve. ICBA aggregates the power of its members to provide a voice for community banking interests in Washington, resources to enhance community bank education and marketability, and profitability options to help community banks compete in an ever-changing marketplace.*

With nearly 5,000 members, representing more than 18,000 locations nationwide and employing over 268,000 Americans, ICBA members hold more than \$908 billion in assets, \$726 billion in deposits, and more than \$619 billion in loans to consumers, small businesses and the agricultural community. For more information, visit ICBA's website at www.icba.org.

majority sees the conversion as beneficial over the long run, despite the costs of changing the reporting system and staff training.

Savings associations that have a focus on commercial and commercial real estate lending expect that moving to the Call Report will result in better peer analysis across the banking industry. They see this as a benefit to the board of directors, management and shareholders.

Some institutions have raised concerns that moving to the Call Report would necessitate the purchase of new systems, perhaps causing them to depend on an outside vendor for a function currently accomplished in house. More commonly, institutions have told ICBA that this would result in cost savings over the long run. Some institutions believe using the Call Report would be beneficial from a staffing perspective as more people in the banking industry are experienced with Call Reports than TFRs.

When the OTS issues a proposal on the conversion of the TFR to the Call Report, we ask that more information be provided about the specific modifications that will be made to the current Call Report and other schedules that savings associations would need to file so that a more specific assessment can be made as to the costs institutions will incur and other operational changes that will be needed to make the conversion. This will enable ICBA and the industry to provide better feedback and more detailed comments on specific proposed changes and their impact.

In summary, ICBA encourages the OTS to continue working towards issuing a proposed rule on converting the TFR to the Call Report. If you have any questions about our letter, please do not hesitate to contact me at 202-659-8111 or ann.grochala@icba.org.

Sincerely,



Ann M. Grochala
Director, Lending and Accounting Policy