

Comment Info: =====

General Comment: It is our opinion that this is a long overdue change.

1. As Thrifts do not file Call Reports they are often left out of banking studies and publications that are used by parties that rate Financial Institutions and report the institutions information to be recognized as being on par with Commercial Banks.
2. The standard UBPR; used by the banking industry and other various users to prepare peer groups and other evaluations is not possible as the information is pulled only from Call Reports not TFRs
3. The bank's core data processor has a module designed to provide almost all the information needed to prepare a Call Report. No such help with a TFR
4. For a Thrift, that functions primarily in the same manner as a commercial bank, a Call Report is a better document to provide information to the public and other users
5. It is also my opinion that as a TFR often precludes its general use in numerous valuations of performance, Thrifts are often under valued as compared to commercial banks
6. The Thrift Charter is in many ways a superior charter for bank operations. Not being included in many banking publications diminishes some of that value
7. When hiring bank accounting staff, it is rare to find someone that has any experience in completing a TFR but almost all of them have prepared a Call Report. Therefore there is almost no learning curve to accurate preparation and as mentioned before the core processor provides information in Call Report formats

I and the management of my Thrift are very supportive of this change. For us it cannot happen fast enough.