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March 17, 2003

Information Collection Comments
Chief Counsel's Office, Office of Thrift Supervision
1700 G Street, N.W.
Washington, DC 20552

RE: TFR Revisions, OMB No. 1550-0023

Dear Sir:

We have reviewed the proposed changes to the TFR and related reporting items. Generally we are in full agreement with the proposed items and feel that incorporating such will achieve the noted objective of aligning the TFR more akin to the other federal banking agencies.

We do have one concern regarding changing the filing "due date" of the TFR and CMR. We, like many institutions utilize general ledger systems that do not "close out" the monthly (as of month end) posting cycle until the 3rd or 5th business day of the subsequent month. Thus, we do not have the availability of final month end general ledger data from which to prepare the TFR and CMR until after approximately one week has elapsed in the subsequent month. For December 31, YYYY data, we do not close out our year-end financial statements until the 10th business day of January. Due to these timing differences, we are concerned about the reduction of the filing due date from 30 days to 20 days after the end of quarter. We feel this shorter deadline will be difficult to meet and will cause undue hardship to comply with. Based on the current hours needed to complete and file the TFR and CMR, additional staffing and/or resources will need to be deployed to meet the proposed 20-day filing deadline. Thus, we would recommend retention of the 30 day, post quarter-end filing due date as to not pose undue hardship and/or additional staffing expense required to meet an earlier filing deadline.

Sincerely:

Thomas J. Hromatka
President