

Evans, Sandra E

From: John Larson [jlarson@equitable-savings.com]
Sent: Thursday, February 20, 2003 4:43 PM
To: infocollection.comments@ots.treas.gov
Subject: TFR Revisions, OMB No. 1550-0023

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I feel the shorter deadlines for TFR and CMR are going to be a real burden on us small institutions where one person is doing the reports. I am sure others are like me and have many other duties and can not start doing the TFR until two weeks after quarter end and one week to do the report is not long enough.

I am also not sure of the average balance thing as we do not use average balances and when we get the TFR/CMR data from the OTS we compare it to our model printout so we can study any differences. Average balances do not tell where you are so I see no real value for them.

Getting the OTS TFR/CMR data two weeks earlier is no big deal for us as we rely more on our model runs.

We do not have Affiliates.

I feel the narrative statement area would be a waste as it should come from the BOD and not the report preparer.

Holding Company data - I feel the annual report is more than enough with the current HC data collected.

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