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To: infocollection.comments@ots.treas.gov
Subject: TFR Revisions, OMB No. 1550-0023

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While it is true that our data service provider is able to provide information on a timelier basis, it is not the only source of information used to complete the TFR and CMR. We have no control over the receipt of information from outside sources used to complete an accurate TFR and CMR. For instance, the Qualified Thrift Lender Test Treatment of AMF Investments for Savings Institutions was received (via the Internet) from Shay Financial Services more than 20 days after the quarter end date for the most recent reporting cycle.

In addition, the proposal puts a burden on small institutions that do not have the resources to meet the requirements of a shorter timetable.

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