

78

March 17, 2003

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

To Whom It May Concern:

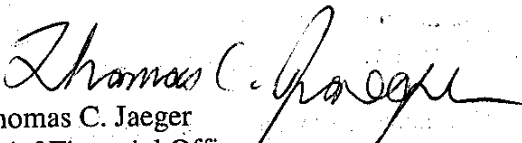
Farm Bureau Bank, FSB (the "Bank") is writing to document concerns with the proposed changes to the filing deadlines for the TFR and CMR beginning in 2004.

The Bank opposes shortening the filing period to 20 days for the TFR and 30 days for Schedule CMR. In a small, yet complex institution like Farm Bureau Bank, the issues involve both technology and staff levels. The same person who prepares our TFR also closes the books each month end. The effort to close the month, prepare board reports, monthly financials, and complete the TFR within 20 days is not realistic. While the Bank's technology is satisfactory, technology does not prepare the reports or review for completeness, reasonableness or accuracy.

The benefits planned to be gained from the proposed shorter reporting period could be sacrificed in additional errors and amended reports. This would be especially true of quarters that coincide with a fiscal year end audit. Also, it is difficult to understand how decisions to be made or actions to be taken as a result of TFR information would be improved significantly by filing 10 days earlier. This is especially true since the data is collected once each quarter. If the decisions or actions were so time sensitive that 10 days make a difference, wouldn't it need to be collected more frequently than quarterly?

In conclusion, we oppose the proposed shorter filing deadline due to resource issues and the almost certain increase in errors it would cause. Also, we question the true value of obtaining the information 10 days early.

Sincerely,


Thomas C. Jaeger
Chief Financial Officer

TCJ/cjc