

## Massachusetts Bankers Association

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

Subject: TFR Revisions, OMB No. 1550-0023

To Whom It May Concern:

On behalf of the federal savings institutions members of the Massachusetts Bankers Association, we are pleased to comment on the Office of Thrift Supervision (OTS) Proposal relating to the Thrift Supervision Report. In particular we are concerned specifically with Section 36, which would shorten the deadlines for filing the Consolidated Maturity and Rate Schedule (CMR) and the Thrift Holding Company Schedule (HC). Our comments will therefore be limited to that section.

According to the proposal the current timeframes afforded for filing these reports, forty-five days for the CMR and thirty days for the HC were originally granted to allow more time in which to receive information from data service providers and holding companies that was needed to complete these schedules. At this time it is the opinion of OTS that technological advances have made this extra cushion of time unnecessary. The earlier availability of this information will allow the analysis of this information to be completed and made available on a timelier basis.

Our small and mid-sized community member banks report however, that the completion of these reports is still a cumbersome process in part because information is not received on a timely basis from their data service providers. They believe that the shortening of the filing deadline will be burdensome and to their detriment. We would also question whether having this information ten days earlier will benefit the public sufficiently to offset the burden placed on these banks. It is also noted that the Federal Deposit Insurance Corporation permits the banks that it regulates thirty days after the end of a quarter for the filing of a Report of Condition. As such we respectfully request that the OTS delete Section 36 from the proposal and leave the filing deadlines for the Thrift Supervision Report as currently in place.

Thank you for the consideration of our views.

Sincerely,



Dale Zelony  
Director of Government & Regulatory Policy