

Trust
Services

65

March 21, 2003

Information Collection Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, N.W.
Washington, DC 20552
Attention: 1550-0023

Re: TFR Revisions, OMB 1550-0023

Ladies and Gentlemen:

Frontier Trust Company, FSB ("FTC") appreciates the opportunity to respond to the notice and request for comments issued by the Office of Thrift Supervision (OMB 1550-0023, dated January 16, 2003, published in Federal Register on January 23, 2003). We would like to comment in particular on the OTS proposal to accelerate the filing deadline for the Thrift Financial Report ("TFR") from 30 days after quarter end to 20 days after quarter end, effective with the March 2004 reporting cycle.

FTC is required to file the Schedule FS quarterly as part of the TFR. Schedule FS shows the total fiduciary and related assets at quarter end. In preparing Schedule FS, FTC must request and incorporate information from many affiliated and non-affiliated entities. The information that would be available to FTC twenty days after the quarter end would likely be materially incomplete, thereby requiring FTC to amend the Schedule FS at a later date. The current thirty-day due date for the TFR generally allows us sufficient time to collect the necessary data from affiliated and non-affiliated entities and therefore helps minimize the need to subsequently amend the Schedule FS, reducing the administrative burden on both FTC and OTS.

FTC appreciates the opportunity to express its concerns on this important matter. Thank you for your consideration of these comments.

Sincerely,

Tony Uhlir

Tony Uhlir, CPA
Business Unit Controller