

Submitted electronically to [infocollection.comments@ots.treas.gov](mailto:infocollection.comments@ots.treas.gov)

66

March 24, 2003

Information Collection Comments  
Chief Counsel's Office  
Office of Thrift Supervision  
1700 G Street, NW.  
Washington, D.C. 20552  
Attention: 1550-0023

Subject: TFR Revisions, OMB No. 1550-0023

Dear Sir or Madam,

I appreciate the opportunity to comment on the above-cited proposed rule regarding changes to the Thrift Financial Report on behalf of Principal Bank.

**Introduction.** Principal Bank is a federal savings bank with a home office in Des Moines, Iowa, and a member of Principal Financial Group. Principal Bank's focus is on electronic banking and it does not utilize a traditional "brick and mortar" branch strategy. Our distribution channels include the Internet, a call center and mail. Principal Bank was chartered in February 1998 and is regulated by the Office of Thrift Supervision (OTS).

Principal Financial Group (The Principal®) is a leading global financial institution offering businesses, individuals and institutional clients a wide range of financial products and services including retirement and investment services, life and health insurance and mortgage banking. Headquartered in Des Moines, Iowa, The Principal® serves more than 13 million customers worldwide.

**Background.** This letter provides Principal Bank's comments on the proposed changes to the Thrift Financial Report (TFR). Our comments are directed to only one portion of this proposed rule: the shorter deadlines for TFR submission, particularly Schedule HC. Section 36 of this proposed rule would shorten the filing due date for the TFR from thirty (30) to twenty (20) calendar days after the end of the quarter, and for Schedules HC and CMR from forty-five (45) to thirty (30) calendar days after the end of the quarter.

These proposed changes present significant issues to Principal Bank (the Bank) and our parent company. Principal Financial Group is a publicly traded company subject to regulation by the Securities and Exchange Commission (SEC). The SEC requires the filing of a Form 10Q, a quarterly report from publicly traded companies. The SEC currently provides companies with 45 days to file the 10Q report. Recently issued guidance will accelerate that filing deadline in 2005.

In any particular quarter, our parent company might not make an earnings release or analyst call until later than 30 days past quarter end. As proposed, the rule would place the Bank in the untenable position of having to submit confidential and sensitive information about our parent's financial performance to the OTS before PFG has had their earnings release or analyst call for the previous quarter. The proposal's assumption that information can be available from holding companies on a more timely basis does not take into account the application of SEC rules, confidentiality requirements on earnings projections, and stock market practices. It is our position that the due date for the Schedule HC should be no shorter than the deadlines our parent has for the Form 10Q.

We respectfully request that filing deadlines with the OTS be no shorter than the deadlines set out by the SEC.

Your consideration of these comments is greatly appreciated. If you have any questions, or would like any additional information, please do not hesitate to call me at (515) 883-9201.

Sincerely,

Joel S. Hjelmaas  
VP and Chief Compliance Officer  
Principal Bank