



# First Alliance Bank

March 21, 2003

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

73

Re: TFR Revisions, OMB No. 1550-0023

To Whom It May Concern:

We wish to comment on following items published in the January 23, 2003, edition of the Federal Register, Vol. 68, No. 15, pp. 3318-3324:

### **Shorter Deadlines for filing TFR, including Schedule IIC and CMR**

This proposal would be a stretch for our, and I am sure, other institutions. Although we have successfully implemented and shorter month end close process, there are still items that require further analysis, which frequently extend our scheduled close date. In addition, much of the required information on the TFR is not readily available from the normal accounting data processing and requires many manual computations.

### **Deletion of Lines in Schedule CF (Cash Flow)**

We agree with the combining of fixed and variable Mortgage Pool Securities into one line for purchases and one line for sales, and the combining of mortgage loan activity of newly built and previously occupied permanent mortgages on residential property into one line. However, we feel that a cash flow schedule that has a look and feel of a GAAP cash flow statement would be more useful.

Thank you for the opportunity to comment on the proposal. We would be glad to discuss any of the above comments.

Sincerely,

Bob Ventrone  
Vice President  
First Alliance Bank