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March 4, 2003

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

In re: TFR Revisions, OMB no. 1550-0023

Dear OTS Chief Counsel's Office:

We are writing in response to the proposed changes to the Thrift Financial Report (TFR) for March 2004. In general, you should be made aware that changes such as this proposal and the continual quarterly changes and clarifications, are a burden on every institution, especially smaller institutions. We are a \$50 million institution and on a good day there are 12 people working in this office. Perhaps its time for a differentiation based on the size of the associations. Certainly you want our institution to be healthy, just like all the others, but we are no threat to the viability of the SAIF Fund the way a billion-dollar institution would be. These items deal with greater minutia, most of which is not easily tracked by computer. Up to this point anyway, sections SC and SO are not difficult to produce because they are basically a balance sheet and income statement. Other sections are not produced so easily, and generally require a certain amount of research on various forms. This is true in the two different computer systems we've used. As greater detail is requested from the OTS, it increases the amount of time and expense to complete the form.

We most adamantly oppose shortening the deadline for the TFR, HC and CMR. In a small institution, individuals have to perform multiple tasks and aren't able to simply set everything aside for the completion of the TFR. In addition, it is possible for quarter end computer generated reports to not be available until the 11th of the month. Your estimated time to complete this report is approximately one workweek and so obviously, this does not provide us with sufficient time, even if we were able to set work and customers aside to concentrate solely on the TFR. Item No. 13 FHLB Dividend Income Change appears to be a complete reversal of what several years ago was set up to alleviate the amount of information provided. Providing more information on items No. 16, Troubled Debt Restructured and No. 17, Guaranteed Loans Past Due, appear to be a further case of unnecessary detail. No. 17 may in fact aid us, but we would prefer to make that argument to the Examiners on site, rather than retool all our reporting in order to track it. Item No.

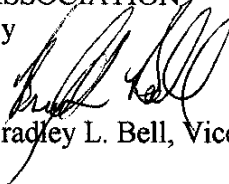
20 for Refinancing Loans from other institutions would certainly add to our burden. Also, it is information that would be handled largely in a manual manner and be subject to considerable possibilities of mistakes. It's hard to believe this type of information would be relevant for the safety of our institution. It appears to be data that would provide fodder for economic tomes that are largely unread and widely ignored.

We appreciate your willingness to listen to our objections, both general and specific.

Sincerely yours,

CUSTER FEDERAL SAVINGS AND LOANS
ASSOCIATION

By

A handwritten signature in black ink, appearing to read 'Bradley L. Bell', is written over the word 'By'.

Bradley L. Bell, Vice President

BLB: djs