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May 19, 2003

10

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

Re: Proposed Agency Information Collection Activities: Comment Request –
Thrift Financial Report: Schedule CMR

Dear Sir or Madam:

Members of the Accounting and Tax Committee of the New Jersey League of Community Bankers* ("the committee") are pleased to provide comments on the proposal to replace Schedule Consolidated Maturity/Rate (CMR) of the Thrift Financial Report (TFR) with a new schedule to be known as Risk Exposure Data (RED).

Will the proposed schedule reduce the reporting burden on thrifts? The committee members note that although the field count is reduced, the RED increases the number of data points by collecting finer grained observations for each field. Initially, the reporting burden would be increased as computer programs are rewritten to provide the additional level of detail and to conform to the new presentation. This reprogramming may be significant. Going forward, the large increase in data points (e.g. interest rate coupon buckets in quarter-point increments) would require additional time to transfer and validate data from computer summaries to the RED. Providing for an automatic download or interface would greatly reduce the time spent transferring data.

Will the proposed schedule result in the collection of better, more useful data? Committee members agree that the current method of aggregation on the CMR is antiquated and often inconsistent between data fields. A more consistent approach with fewer field definitions should result in the collection of better and more useful data.

* The New Jersey League of Community Bankers is a trade association representing 75 of New Jersey's savings banks, savings & loan associations and commercial banks with total assets of over \$50 billion. The League's wholly-owned subsidiary, the Thrift Institutions Community Investment Corporation ("T.I.C.I.C.") assists League members in forming consortia to make loans on low-to-moderate income housing and economic development projects throughout New Jersey. T.I.C.I.C. has facilitated loans on nearly 4,000 affordable housing units and has loans in process on over 500 more affordable housing units. Total loans made and loans in process total \$269 million.

Will the data collected on schedule RED result in improvements in the accuracy of the institution-specific and industry wide Interest Rate Risk Exposure analysis?
Committee members believe the improved internal consistency and the greater degree of granularity should improve the interest rate risk exposure results.

We appreciate the opportunity to provide these comments on the proposed new reporting requirement.

Sincerely,

James R. Silkensen
Executive Vice President

JRS/js