



September 29, 2005

Steven F. Hanft, Paperwork Clearance Officer
Room MB-3064
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429

Ref: Consolidated Reports of Condition and Income, 3064-0052

Dear Sirs:

This letter is in response to the FIL-86-2005 regarding proposed revisions to the Reports of Condition and Income. The proposed revisions detailed in the FIL indicated that certain items are to be eliminated or revised or added to the Call Report. I applaud the efforts of the FFIEC and the Regulatory Agencies in eliminating outdated and unnecessary data. However the proposed additional revisions, especially the splitting of certain loan categories into additional line items are of concern.

Most banks identify their loans by some type of data code in their data processing system. "Splitting" current loan categories into additional line items will be a considerable project in many banks. Each loan in the current category will need to be reviewed to determine if it would fall into a new identifying code it and then maintenance would be required to the data base. Also, many banks have their Statement of Condition and Income Statement arranged in Call Report format, this would also need to be modified to accommodate the proposed changes. A preliminary review indicates that it would take a considerable amount of man-hours to make these changes in our bank.

I urge the consideration of the cost of complying with these proposed changes to the value of the information derived from such.

Sincerely,

Virgil Harrington, S.V.P. & Cashier