



**INDEPENDENT COMMUNITY
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President and CEO

February 19, 2009

Mr. Herbert J. Messite
Counsel
Attn: Comments, Room F-1052
Federal Deposit Insurance Corporation
550 17th Street, NW
Washington, DC 20429
Re: Consolidated Reports of Condition
and Income
OMB Number: 3064-0052

Ms. Jennifer J. Johnson
Secretary
Board of Governors
of the Federal Reserve System
20th Street and Constitution Avenue, NW
Washington, DC 20551
Re: Consolidated Reports of Condition
and Income (FFIEC 031 and 041)
OMB Number: 7100-0036

Communications Division
Office of the Comptroller
of the Currency
Public Information Room
Mailstop 1-5
Attention: 1557-0081
250 E Street, SW
Washington, DC 20219
Re: OMB Number: 3064-0052

Information Collection Comments
Chief Counsel's Office
Office of Thrift Supervision
1700 G Street, NW
Washington, DC 20552
Re: 1550-0023
TFR Schedule DI Revisions
OMB Number: 1550-0023

Submitted via email

Dear Sir or Madam:

The Independent Community Bankers of America (ICBA)¹ appreciates the opportunity to comment to the Federal Deposit Insurance Corporation, Office of the Comptroller of the Currency, Board of Governors of the Federal Reserve System, and Office of Thrift Supervision, collectively referred to as the Agencies, regarding

¹ *The Independent Community Bankers of America represents nearly 5,000 community banks of all sizes and charter types throughout the United States and is dedicated exclusively to representing the interests of the community banking industry and the communities and customers we serve. ICBA aggregates the power of its members to provide a voice for community banking interests in Washington, resources to enhance community bank education and marketability, and profitability options to help community banks compete in an ever-changing marketplace.*

With nearly 5,000 members, representing more than 20,000 locations nationwide and employing over 300,000 Americans, ICBA members hold \$1 trillion in assets, \$800 billion in deposits, and \$700 billion in loans to consumers, small businesses and the agricultural community. For more information, visit ICBA's website at www.icba.org.

proposed changes to Consolidated Reports of Condition and Income (Call Report) for banks and the Thrift Financial Report for savings associations.

The proposed changes would allow the Agencies to modify the Call Report and Thrift Financial Report to collect additional information from institutions participating in the Transaction Account Guarantee Program under the Temporary Liquidity Guarantee Program regarding the amount and number of noninterest-bearing and low interest-bearing transaction accounts with balances more than \$250,000. This new data would be reported as Memorandum items 4.a and 4.b of Schedule RC-O in the Call Report, and items DI570 and DI575 of Schedule DI in the Thrift Financial Report.

Recognizing the necessity of collecting this information for the appropriate execution of the Transaction Account Guarantee Program, ICBA supports the proposed changes.

Thank you for the opportunity to comment on this proposal. If you have any questions or need additional information, please contact the undersigned by email at viveca.ware@icba.org or by telephone at (202) 659-8111. Thank you.

Regards,

/s/

Viveca Ware
Senior Vice President
Payments and Technology Policy