



76

March 14, 2003

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

Attention: TFR Revisions, OMB No. 1550-0023

MidFirst Bank, OTS Docket 14191, Oklahoma City, Oklahoma, is pleased for the opportunity to review and to comment on the Proposed Agency Information Collection Activities Comment Request - Thrift Financial Report (the "TFR") as published in the January 23, 2003, *Federal Register*, pages 3318 through 3324. A periodic review of the TFR reporting requirements and processes ensures the report content is consistent with industry practices and strategies.

Reporting Deadlines

MidFirst opines that the current TFR reporting deadline of 30 days following quarter end is appropriate, and that any shorter deadline would be overly burdensome to savings associations without providing the OTS or the public with a commensurate benefit. The OTS has not justified that shortening the TFR deadline by 10 days will offer a material benefit to the regulatory monitoring process or will improve the timeliness of any potential enforcement action. One method of justifying such action would be for OTS to determine the number of enforcement or supervisory actions (whether in the form of a judicial order or a supervisory directive requiring an institution to pursue a particular action) that have occurred within a) 10 days and b) 30 days of the submission of a TFR and stemming directly from the contents of that TFR. Without this benefit, there is no justification for increasing the reporting burden on institutions. Further, the OTS must balance the risks of receiving inadvertently erroneous TFR data due to the shortened deadline. Finally, MidFirst notes that current FFIEC Call Report Instructions have a deadline of 30 days following quarter end.

Transactions with Affiliates

MidFirst asks the OTS to consider the impact of releasing certain data elements to the public. For example, the proposed Transaction with Affiliate reporting is information of interest to a regulator but if received by a competitor could create harm to the reporting institution. It is not clear what public benefit would be achieved if OTS released such information.

Should you require additional information on the above or other issues in the TFR Notice and Request for Comments, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles R. Lee". The signature is fluid and cursive, with a long horizontal stroke at the end.

Charles R. Lee
Vice President and
Director of Bank Administration
MidFirst Bank