

March 21, 2003

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

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Dear Sir or Madam;

I am writing regarding TFR Revisions OMB No. 1550-0023 and in particular the provisions for reducing the time frame for filing TFR and CMR reports. We are a publicly traded company with quarterly deadlines for filing reports to the SEC. We utilize the time efficiently to coordinate the filing of all regulatory reports. SEC has recently accelerated the time requirements for its filings. This additional burden proposed by the OTS will cause our institution to increase our regulatory cost burden by forcing us to increase staff to meet these guidelines.

As an alternative, I suggest the OTS focus on reducing the time burden associated with producing the TRF/CMR and move toward the Call Report standard provided by the other FFIEC members. The time to prepare a Call Report is less than 20% of the time it takes to complete the TFR/CMR.

Sincerely,

\s\ Darrel L. Posegate

Darrel L. Posegate
Executive Vice President/ Chief Financial Officer