

**LOOMIS FEDERAL SAVINGS
AND LOAN ASSOCIATION**

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ESTABLISHED IN 1929

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FAX	1 page
To: OTS	
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Manager, Dissemination Branch
Information Management and Services Division
Office of Thrift Supervision
1700 G Street, N.W.
Washington, D.C 20552

Re: Proposed changes in the TFR

Dear Sir or Madam:

Regarding change number 13, Average Balance Sheet Data, we believe that savings associations (especially small institutions) should be able to have the option of calculating these averages using a monthly basis.

The requirement of weekly averages increases labor gathering time for these three averages by a factor of 52 for one association. The data for small institutions does not change enough to warrant this increase in costs to the system.

The Federal Reserve Bank of Chicago has recognized the efficiencies of reduced reporting for smaller institutions. Once Regulation D reports were due weekly, then the frequency was reduced to quarterly, and then again the frequency was recently reduced to annually.

We believe the time and resources of our association would better spent in serving our customers. We would like to thank your office for allowing comments to these matters.

Yours truly,

David M. Opas
David M. Opas
President

