

May 16, 2003

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

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RE: Thrift Financial Report: Schedule CMR, OMB No. 1550-0023

Ladies and Gentlemen:

This Comment Letter is submitted on behalf of Guaranty Bank, a federal savings bank and a wholly owned subsidiary of Temple-Inland Inc. We appreciate the opportunity to comment on the proposed rule, Thrift Financial Report: Schedule CMR, OMB No. 1550-0023. Guaranty Bank applauds the effort of the Office of Thrift Supervision (OTS) to improve the NPV model by assessing interest rate risk in relation to portfolio risk attributes, and to make the CMR schedule more flexible.

Our concern is that the technological means needed to gather information for Schedule RED in the form that could then be transferred to OTS does not currently exist, will be very expensive to develop, and could not be implemented by January 1, 2004. At the present time Guaranty Bank collects CMR information from eight various database sources, enters the collected data into spreadsheets to consolidate the information, and then manually enters the consolidated information into the OTS software. The increased granularity of Schedule RED would *significantly* increase the number of data points or observations that would have to be reported. We do not currently have the human resources or technological means to get the information required by Schedule RED to OTS. Developing this technology will take time and will be expensive. Although mention was made in the proposal that OTS is contemplating allowing thrifts to submit non-aggregated (that is account-by-account) data, there is no mention of how this would be accomplished.

Therefore, before Schedule RED can be implemented, OTS, as well as many financial institutions, will have to develop the technology to collect and transmit the information. Using current procedures, the proposal's estimated burden of 12 hours is unrealistic.

Again, we appreciate the opportunity to provide comment on this important proposal. We commend OTS on its efforts to improve the NPV model and make the CMR more flexible. However, the benefit derived may not be enough to offset the financial burden put on OTS and the financial institutions it regulates.

If you have any questions, please call either Mike Calcote at (512) 434-1086 or Mary Helen MacAllister at (512) 434-4948.

Sincerely,  
**GUARANTY BANK**

Mike Calcote  
Chief Financial Officer

Mary Helen MacAllister  
Regulatory Accounting Manager

Cc: Mary Clouthier