



**FIDELITY NATIONAL
INFORMATION SERVICES**

Fidelity National Information Services
601 Riverside Avenue
Jacksonville, FL 32204
Tel 904.854.3277
Fax 904.854.4375
Dan.Knight@fnf.com

December 05, 2006

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

Subject: Comments on 1550-0023 (TFR Revisions-March 2007)

To Whom It May Concern:

As Fidelity National Information Services, Inc. ("FIS") software compliance attorney, I am writing to you concerning the proposed compliance date stated in the Comment Request-Thrift Financial Report: Schedules SC, SO, LD, CF, SI, SQ and HC as published in the Federal Register on December 1, 2006. In that document, it states that revisions to specific schedules in the TFR would take effect as of March 31, 2007. Since these revisions are currently proposed requirements and will not be finalized until after the comment period ends on January 2, 2007, this is a proposed timeframe that seems unattainable to us; and unfortunately we feel we can not commit to meeting this target time-frame to program, test and implement these changes to meet this proposed compliance date.

FIS' Mortgage Servicing Package ("MSP") is used to service nearly sixty percent of the residential mortgage loans in the United States. Some of our clients include Wells Fargo, Washington Mutual and Bank of America. FIS works proactively to deliver timely programming changes to our clients to ensure that they meet compliance deadlines. Because MSP is a large and complex system, even the simplest changes require time to confirm accurate programming through our established testing and quality assurance procedures. We typically need and request a minimum of 180 days from the date final requirements are published to implement required changes.

Making system modifications in a timely manner to meet compliance deadlines is one of our highest priorities. With the OTS's accommodation to our request, our clients will be able to achieve and maintain compliance because FIS will be able to implement the necessary changes to our systems in a timely manner.

I look forward to continuing a dialogue around this issue and the opportunity to answer any questions you might have. Please feel free to contact me at (904) 854-3277.

Regards,

Daniel L. Knight, Esquire
Business Strategy - Compliance
Fidelity National Information Services, Inc.