

ALLTEL INFORMATION SERVICES

601 Riverside Ave
Jacksonville, FL 32204-2987

904-854-5000
904-854-5298 fax

ALLTEL

15

September 27, 2000

DISSEMINATION BRANCH

2000 SEP 28 P 4: 48

Manager, Dissemination Branch
Management and Services Division
Office of Thrift Supervision
1700 G Street NW
Washington, DC 20552

To Whom It May Concern:

I am writing in response to your request for comments on the proposed changes to the Thrift Financial Report to be effective with the March 2001 reporting period.

In reading through the proposed changes it is clear that there are still several outstanding decisions to be made regarding the definition of SubPrime Loans. My chief concern is that there has been no indication of when the "final" definition will be published, yet the proposed deadline for implementation has already been stated. As an information services provider we can not begin making any necessary system changes until the final requirements are defined. I am concerned that if the final requirements are not decided upon until the latter part of October, or beyond, that an implementation date of March 2001 will not give us the time to make the necessary system changes. Additionally, if the final requirements necessitate the reference to loan data presently recorded only in the original loan documents (i.e., not previously transcribed for system storage), time must be allowed for financial institutions to retrieve the necessary data and enter it into newly programmed system data fields.

Typically in the mortgage banking industry, regulatory institutions afford their servicers, and their financial system service providers, six to nine months after final definition to code, test, and implement regulatory changes. I ask that you consider restating the required implementation date as the quarter ending six months subsequent to the resolution of the definitions and the publication of the final requirements.

Sincerely,



Mark W. Wilson
Vice President, ALLTEL Information Services

Office: (904) 854-5727
Fax : (904) 854-4395
email: Mark.W.Wilson@ALLTEL.com