



WOLVERINE BANK

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November 15, 2010

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

Proposed Agency Information Collection Activities; Comment
Request--Thrift Financial Report: Schedules SC, SO, VA, PD, LD, CC, CF,
DI, SI, FS, CCR, and VIE; TFR Revisions--2011, OMB No. 1550-0023

To whom it may concern,

Thank you for the opportunity to submit our comments regarding the Line Items titled "Total Amount of Deposits Obtained Through Deposit Listing Services That Are Not Brokered Deposits" and "Average Daily Deposits Totals: Deposits Obtained Through Deposit Listing Services That Are Not Brokered Deposits".

[Institution Name] firmly believes that the agency should NOT move forward with this addition to the TFR, as it will place extra and undue burdens on the institution. Accurately identifying and reporting all deposits that are generated through the use of the Internet, deposit listing services and other automated services would be difficult, if not impossible, tasks to accomplish due to the reasons outlined below.

- **Not all listing services serve the same types of customers.**
[Provide specific example(s) of the different types of Internet deposits your institution generates (i.e. through QwickRate, BankRate.com or other Internet services) and the vast differences among the various customers they serve. Also indicate the varying degrees of detail available to identify the source of deposits generated by these means. Would it be possible for you to identify all Internet-based deposits?]
- **Not all listing service deposits can be easily tracked and controlled.**
[Provide specific example(s) of the challenges your institution would face in tracking and controlling all of the Internet deposits generated. Include examples of any deposits that would be impossible for you to track.]
- **Not all listing services represent a source of high-yield liquidity.**
[Provide specific example(s) of Internet deposits for which your institution pays less yield than deposits coming from your local market or other funding source.]
- **The Line Item changes may dissuade further examination.**
[Express any concerns your institution has that examiners may label all the deposits in these Line Items as high-risk, high-volatility funding — without performing a more detailed analysis of the individual deposits.]

We appreciate the agency's consideration of our strong objections to the proposed revisions of the TFR requirements. With all due respect, we request that the agency seriously consider the hardship that this proposal will place on financial institutions. We would also encourage the agency to weigh that burden against the questionable likelihood that such a change will result in a fair and accurate evaluation of all deposits to be included in the new Line Items.

Sincerely,

Richard A. Hansen Jr.
Senior Financial Analyst

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