



LEHMAN BROTHERS

Christopher O'Meara
Global Financial Controller

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Manager
Dissemination Branch
Information Management and Services Division
Office of Thrift Supervision
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DISSEMINATED

This letter is in response to your notice and request for comments on Proposed Agency Information Collection Activities, reported in 65 Federal Register 151 pp. 48049-48056, August 4, 2000, specifically paragraph 19, which would require that a thrift holding company file financial reports on the same basis as its affiliated savings institutions as part of the association's TFR and within the same timeframes. In cases such as ours, where the holding company has a different fiscal year from that of the savings association, complying with the proposed rule would be extremely burdensome. As you are aware, such a difference in fiscal year end between parent and subsidiary is not unusual.

As background, in June 1999 Lehman Brothers Holdings ("LBH") acquired a Delaware thrift, Lehman Brothers Bank (the "Bank"). As of the end of the latest fiscal quarter of the respective entities, total assets of the Bank were approximately \$4.9bn while total assets of LBH were \$228bn. The Bank has a calendar fiscal year while LBH's fiscal year ends November 30.

We believe it would be an undue burden on LBH to prepare additional sets of full financial statements as of the end of each calendar quarter (for purpose of complying with the Bank's filing requirements) so close to having done so as of the end of LBH's fiscal quarters. Approximately 725 subsidiaries' information is aggregated into LBH's consolidated financial statements, requiring over a month's work from both our internal and external accountants for each reporting period. The cost of preparing additional reports as contemplated by the proposed rule both in terms of the work required to prepare additional financials and in the imposition of a reporting requirement not applicable to the Firm's competitors does not justify the benefit, if any, of providing this information. In addition, because the dates of the financials are only one month apart, we do not believe there is any additional benefit. Accordingly, we believe that where a holding company and its affiliated savings bank have different year-ends, the new rule should at the least provide for an exemption permitting the parent to file financial statements as of a date not more than 2 months from the Bank's reporting date.

If you have any questions, please contact me at 212-526-9295.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chris O'Meara".