

ThirdFederal®

SAVINGS & LOAN ASSOCIATION OF CLEVELAND, MHC

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March 21, 2003

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

Attention 1550-0023

Via Facsimile

Re: TFR Revisions, OMB No. 1550-0023

Dear Sir or Madam:

Third Federal Savings & Loan Association of Cleveland, MHC is pleased to submit this letter on behalf of its three insured savings association subsidiaries in response to the Office of Thrift Supervision ("OTS") proposal published in the Federal Register on January 23, 2003 to make changes to the Thrift Financial Report ("TFR") and accelerate the filing deadline effective with the March 2004 report. Our subsidiaries are Third Federal Savings & Loan Association of Cleveland (\$8 billion of assets), DeepGreen Bank (\$275 million asset internet only thrift) and Ohio Central Savings (\$50 million of assets).

The OTS efforts to adopt GAAP presentations within the TFR make the information more relevant and useful even for internal management. The effort to more closely align reporting of financial information across the Federal banking agencies is valuable and we are extremely disappointed that your proposal regarding changes to the CMR does nothing to reconcile the significant difference in reporting burden for thrifts versus their banking counterparts with respect to interest rate risk sensitivity.

Shorter Reporting Deadline

The proposal having the most profound effect on our subsidiaries is your proposal to shorten the deadline for filing the TFR. Even at the largest thrift, where you believe that technological advances over the past several years justify the request, the shortened reporting timeframe comes with considerable cost. Currently one associate completes the internal management reporting and then, on a quarterly basis, moves on to complete the TFR. Your proposal would require adding to staff so that preparation of the internal management reports and TFR can proceed on a parallel path for completion at approximately the same date. It would then be necessary to reconcile TFR data to the

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final closed financial statements, a process that is not currently necessary. The burden at the smallest thrift is even more significant since associates there wear many hats. The individual completing the TFR and internal management reports is also a key member of operating management, responsible for supervising daily operations and regular contact with customers. Adding overhead in this smaller operation has a greater effect on profitability.

As an alternate solution, the OTS should consider using the examination process to identify those institutions exhibiting greater risk and accelerate the reporting deadline for those institutions only, rather than the entire industry. This would also permit a more expansive request for data in areas of specific concern to the regulatory process. Your proposal cites the earlier availability of UTPR data as a benefit of the shortened deadline. We would like to add that while we find the UTPR a valuable tool for historical trend analysis, our day to day management decision making is more affected by future economic projections and local competition than past industry performance and even our own past performance. We do not consider the benefit of earlier UTPR results worth the additional cost to our three institutions.

Transactions With Affiliates

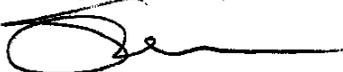
The value of this information in the supervision process is clear and we can not argue that it is our responsibility to provide such information on a timely basis. We feel strongly however; that this information should not be made public. Even the Securities and Exchange Commission, whose goal is to provide financial transparency to investors, does not require disclosure of this type of information.

In regards to the specific information requested, we feel that reducing common director and officer positions among affiliates to a single percentage cannot be as valuable to the supervision process as the detail provided in the H-b(11).

Thank you for the opportunity to comment on these proposed changes and if you have any questions I may be reached at (216)429-5340. We hope that the OTS will consider other less costly alternatives to enhanced supervision than shortened reporting deadlines. We believe that the capital expended in those efforts is much better left in equity to protect the insurance fund than spent on additional systems and staff.

Sincerely,

*Third Federal Savings & Loan Association
Of Cleveland, MHC*



Stephen A. Fowle
Chief Financial Officer