

From: [Debie Keesee](#)
To: [Call Report Modernization](#)
Subject: Spokane Media FCU Comments on Call Report Modernization
Date: Monday, April 02, 2018 4:33:38 PM

Dear Mary Thor,

On behalf of Spokane Media FCU and our 1200 members I would like to take this opportunity to respond to your request for comments on Call Report Modernization. In addition our credit union has the opportunity to assist 6 other credit unions with their 5300 reporting, so we have the occasion to look at lots of different levels of complexity and processes for those credit unions.

In viewing the new format I would applaud the instructions. They appear to have additional data that would answer some questions that credit unions and examiners have not had clear clarification on in the past. Doing multiple credit unions I have had examiners request different data for different credit unions based on their interpretation of the instructions, hopefully that can resolve some of those differences.

Because of the number of changes that have been implemented I would ask that you allow additional time for the first quarters report to be completed if at all possible. Perhaps 7 weeks would be reasonable rather than the standard 4, we will have to completely remap our data in our system to gather the auto-populated tools we currently use on a routine basis. While doing this in the first quarter seems like good timing the first quarter of the year is a busy time for lots of other types or reporting; tax files, payroll etc, so would recommend second quarter of the year.

While change is tough and you will never get us all to agree on anything the page number format seems a bit confusing rather than standard page numbers as you have done in the past.

Additionally having the investment maturity listed on FC-C doesn't make sense for credit unions that have only CD's for investments and no other investment types. Having all of the investment information at the front of the report rather than the back doesn't really flow easily for non-complex smaller credit unions. From my perspective it actually looks like for small credit unions you are making the investment portion more difficult to complete than it was previously. Form my credit union, I did page one, and done, in the past not so with the new format.

I am not certain why you added an additional category to the delinquency reporting, perhaps that is in line with the new CECL regulations. You must recognize that most data processors will have to make format changes to their reports and in doing so most will pass that cost on to their credit unions so you have raised almost all credit unions costs. If it is going to be necessary for CECL implementation than doing so now makes perfect sense. I also questioned the feasibility of allowing 90% of the payment to count as a full payment. Again if that is a CECL rule then it makes sense if not, not sure how the DP systems could calculate that.

Also I am very fortunate that our data processor (CU*Answers) provides a software tool to complete our 5300 where information is auto-populated. However this big of a change is going to necessitate a great deal of programming changes, so all of your deadlines need to keep in mind their implementation and testing schedules and allow adequate time for both. The only way my credit

union is able to assist others (and make money for our credit union) is because of these tools.

Thanks for working to make the 5300 less of a burden.

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