



September 3, 2013

Ms. Mary F. Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Re: Comments on Notice of Proposed Rulemaking for Part 741 and Part 748
Filing Financial and Other Reports

Dear Ms. Rupp:

On behalf of the North Carolina Credit Union League (NCCUL), I am writing in response to the NCUA's recently issued proposal on requiring all federally insured credit unions to file financial, statistical, and other reports, including call reports, electronically using NCUA's information management system. Specifically, the proposed rule removes the ability of credit unions to file the reports manually as required under sections 741.6(a) and 748.1 of NCUA's regulations.

By way of background, the NCCUL advocates for 85 North Carolina credit unions which provide financial services to nearly 3.4 million members. NCCUL is supportive of the proposal to end manual reporting and is appreciative of the NCUA's efforts to transition smaller credit unions onto this electronic platform. The intent of this brief comment letter is to provide insight into an additional regulatory change that could benefit the credit union system as a whole.

In accordance with NCUA regulations and the Federal Credit Union Act¹, NCUA has the authority to set financial and statistical reporting dates for all insured credit unions. NCCUL would respectively request the NCUA to consider changing the required filing date for call reports to no later than 30 days after the end of each calendar quarter. An extended period of time to prepare call report data will provide credit unions with regulatory relief and presents no safety and soundness threat.

In a letter submitted by Self-Help, it is noted that the recent expanded complexities of call report requirements for credit unions should warrant an adjusted reporting schedule. We, and other credit unions represented by NCCUL, concur with the comments provided by Self Help and would welcome an extension of the reporting deadline. Further, giving credit unions more time to report creates consistencies with the Federal Deposit Insurance Corporation's reporting deadlines for all insured national and state-chartered banks and thrifts.

¹ Section 741.6(a) and 12 USC 1782 (a)(1)

NCUA has shown a commitment to reducing regulatory burden and we believe the suggested call report changes would be a step in that direction. Thank you for your consideration.

Respectfully Submitted,

A handwritten signature in black ink that reads "John F. Radebaugh". The signature is written in a cursive style with a large, prominent initial "J".

John Radebaugh
President/CEO
North Carolina Credit Union League
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