



STATE OF ALABAMA
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April 2, 2018

Ms. Mary Thor
National Credit Union Administration
Office of Examination and Insurance
1775 Duke Street
Alexandria, VA 22314

Via Email: CallReportMod@ncua.gov

Re: Call Report /Profile Content Modernization Comments
Alabama Credit Union Administration

Dear Ms. Thor:

As Administrator of the Alabama Credit Union Administration (“ACUA”), I offer the following comments to the proposed updates to the 5300 Call Report. Comments are organized by section of the Call Report and include recommended changes to the current Call Report form.

I. Cash and Deposits FC-1:

Because time deposits may be cashed out with or without an interest penalty, time deposits should be included in cash on deposit (rather than in a separate line).

Alternatively, the categories should be “noninterest bearing deposits in financial institutions” and “interest bearing deposits in financial institutions” (underline added for emphasis).

II. Loans FC-2:

Recommend that loans net of allowance should be presented on the face of the statement of financial condition

III. Other Assets FC-2:

Recommend changing Foreclosed and Repossessed assets items a-d to the following categories:

- a. other real estate owned; and
- b. repossessions (to include commercial non-real estate repossessions)

If NCUA desires to maintain the categories of Foreclosed and Repossessed assets, then we ask that NCUA consider changing line “a. Commercial” to “a. Commercial real estate” and

adding another category, “All other Commercial property- non- real estate” (underline added for emphasis).

IV. Additional Shares/ Deposits on FC-3

Recommend omitting Line 25- commercial deposits. This category is not tracked in many credit unions.

V. Equity-FC-4

Recommend adding a category entitled “Total Equity” to reflect the credit union’s calculation of its total equity.

VI. Interest Income IE-1

Recommend adding a category entitled “Net interest on loans” . Alternatively, recommend deleting line 2. “(Less) Interest refunded”.

VII. Loans, Supplemental Information FC-E

Recommend adding a category entitled “Nonaccrual Loans” to the Commercial loan information.

Also in this section recommend adding number of extensions to include both quarterly and year to date. The category would be designated “Number of Extensions granted QTD and YTD”.

VIII. Schedule FC-F Delinquent Loans

Recommend revising the schedule to show past due 90 days still accruing and past due 90 days nonaccrual (underline added for emphasis).

IX. Schedule FC-N

Recommend adding a line for “Letters of Credit”.

Thank you for the opportunity to comment on the proposed changes to the 5300 Call Report.

Respectfully Submitted,



Sarah H. Moore
Administrator