

August 15, 2016

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428b

Re: Call Report/Profile Modernization

Dear Mr. Poliquin:

The Carolinas Credit Union League (CCUL), a trade association representing the interests of 140 credit unions in North and South Carolina, appreciates the opportunity to comment on the National Credit Union Administration's (NCUA) Call Report/Profile Modernization. Because we understand that credit unions are community institutions built on a philosophy of people helping people, CCUL works to protect and advocate for credit unions that provide financial services to their member-owners.

We welcome NCUA's request for information concerning the 5300 Call Report and Form 4501A Profile (Call Report/Profile) as it reflects the agency's commitment to improve the collection of financial data with a more efficient and less burdensome system. The following comments reflect concerns expressed by our member credit unions regarding the Call Report and Profile.

Are the Call Report/Profile instructions adequate?

- The instructions are too ambiguous leading to different interpretations, more errors, and ultimately more time spent completing the Call Report/Profile. One recommendation is to create a hotline for credit unions to call and a dynamic webpage presenting the questions and answers. This would provide much-needed consistency.
- Another challenge is getting assistance from NCUA on a particular schedule, line item, or page. Creation of a hotline and webpage would alleviate this challenge.
- Call Report instructions are over 100 pages; credit unions would like to see more streamlined instructions.

What specific changes can be made to the Call Report/Profile Form to improve functionality?

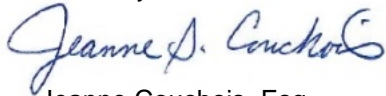
- A number of credit unions would like to see a more static report with fewer changes. Numerous changes increase the burden of completing the report. This is especially true for small credit unions, which often do not have the financial resources to request changes or new reports from their data processor. A recommendation is to make modifications only on a yearly basis.
- Create a system that would allow a credit union to pick only the schedules applicable to them. For example, the system should allow a credit union that does not participate in derivatives to completely skip this schedule.
- The Call Report should be due at the end of the month similar to other banking regulatory agencies. This would produce consistency within the industry, and credit unions would not have to look up quarterly report due dates.

(Specific changes to Call Report/Profile Form, continued)

- Create a system that feeds information from all schedules and detail pages to the balance sheet and income statement. This would eliminate the need to enter information multiple times, and to reconcile and validate the report independently.

CCUL appreciates NCUA's commitment to improving the Call Report/Profile, and in turn providing a more robust system that gathers only necessary information in a clear and concise streamlined process. A modernized reporting system should improve the accuracy of the Call Report while reducing the time necessary to complete the Call Report/Profile. These improvements also would reduce costs associated with completing the report.

Sincerely,

A handwritten signature in blue ink that reads "Jeanne A. Couchois". The signature is written in a cursive style with a large initial "J" and "C".

Jeanne Couchois, Esq.
VP Compliance and Regulatory Counsel