

August 15, 2016

Filed via CallReportMod@ncua.gov
 Mr. Mark Vaughan
 Office of E&I
 National Credit Union Administration
 1775 Duke Street
 Alexandria, VA 22314-3428

Re: Comment on RFI for Modernizing Data Collection for Regulatory Oversight of Credit Unions

Dear Mr. Vaughan:

As the nation's leading credit union service organization, PSCU is pleased to comment on the RFI for Modernizing Data Collection for Regulatory Oversight of Credit Unions. For context, we are owned by nearly 800 member credit unions nationwide. PSCU delivers service, technology, product, portfolio analysis and pricing advantages they cannot achieve individually.

Our comments address one of the questions raised by the NCUA: What specific items would you like to see added to the Call Report/Profile to enhance analysis of local, regional and national performance trends or improve comparisons of individual credit unions with peer institutions? We believe that the following suggested changes will enhance analysis and improve comparisons:

Suggestion	5300	FPR (Financial Performance Report)
<ul style="list-style-type: none"> • Debit - there is a “switch” – a “1” says they have a program and “0” says they don’t have a program. It would enhance analysis to also at least list: <ul style="list-style-type: none"> ○ The number of active debit cards ○ The point-of-sale sales volume for signature transactions ○ The point-of-sale sales volume for PIN transactions 	Add to report	Add to report
<ul style="list-style-type: none"> • Add the “efficiency ratio” (which is a common “banking” key performance indicator) 	Add to report	Add to report
<ul style="list-style-type: none"> • Breakout significant items in both Non-interest Income & Non-Interest Expense. Today these are rolled together: <ul style="list-style-type: none"> ○ Interchange income (ideally further broken out by credit card versus debit card) ○ Fee Income – broken out by source, e.g., mortgage, etc. ○ Marketing expense 	Add to report	Add to report

Suggestion	5300	FPR (Financial Performance Report)
<ul style="list-style-type: none"> • There is information on the 5300 report that is not included on the FPR: <ul style="list-style-type: none"> ○ # of credit card loans ○ \$ Indirect loan outstandings ○ # of online banking users ○ \$ Credit card contingent liability 	Exists on the report	Add to report
<ul style="list-style-type: none"> • There is information that is becoming increasingly important given the role of payments to the credit union and its members: <ul style="list-style-type: none"> ○ # of mobile users ○ # of active web site users ○ # and \$ of payment volumes broken out by: <ul style="list-style-type: none"> - Checks - ACH <ul style="list-style-type: none"> ○ CU to business ○ P2P ○ CU to consumer - Wires - Debit <ul style="list-style-type: none"> ○ Signature <ul style="list-style-type: none"> ▪ POS <ul style="list-style-type: none"> • % Mobile ▪ Online/Phone <ul style="list-style-type: none"> • % Mobile ○ PIN <ul style="list-style-type: none"> ▪ ATM <ul style="list-style-type: none"> • % Mobile ▪ POS <ul style="list-style-type: none"> • % Mobile ▪ Online/Phone <ul style="list-style-type: none"> • % Mobile - Credit <ul style="list-style-type: none"> ○ POS ○ Online/Phone <ul style="list-style-type: none"> ▪ % Mobile 	Add to report	Add to report
<ul style="list-style-type: none"> • There is information that is confusing as to how it is reported by credit unions and there are huge reporting disparities among credit unions: <ul style="list-style-type: none"> ○ # of credit card loans – Is this total accounts? Active accounts? Stated accounts? Non-stated accounts? Ideally credit unions would report each of total accounts and active accounts, and the clean-up would clarify that stated accounts should be excluded. 	Clean-up definition	Add to report

