

August 1, 2016

Mr. Mark Vaughan
NCUA Office of Examination and Insurance
1775 Duke Street
Alexandria, VA 22314

Re: Call Report/Profile Content Modernization - Amplify FCU Comments

Dear Mr. Vaughan,

Please find below Amplify Federal Credit Unions responses to the questions posed regarding the call report/profile modernization.

What specific areas of the Call Report/Profile forms do you find challenging to complete? Please describe the nature of those challenges.

The Mortgage and Business loan sections are the most difficult to complete. The mortgage section is difficult not only because of the many various categories, but also because it has to tie to the balance sheet. This becomes an issue when we are off by \$1 and we have to decipher if it is 1st or 2nd liens that are off. It would be helpful if the 1st and 2nd liens were subtotaled, so that those totals could then be compared and reconciled to the balance sheet. Also, condensing the breakout would make this section easier to update.

The Business loan section is also difficult to complete because of the calculation of net member business loan balances and the multiple categories that breakout Real Estate and Non-Real Estate loans. Then this information is further broken out by member and non-member. We think that if these categories were condensed, then this section would be easier to complete. We are also not sure that there is much value in parsing the member vs. non-member loan split numbers.

What sections/schedules/items on the Call Report/Profile could be made optional for small or non-complex credit unions without complicating assessments of risk?

Pages 7-10 (Delinquencies and Charge offs) and Pages 13-16 (Off balance sheet information, Specialized lending) should be simplified for smaller CU's.

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?

For the Statement of Income and Expense: To better match actual spending categories, please include breakouts for these expense line items: Comp and benefits, Building and Property costs, Operations, Products, Loan Expense, and Marketing/Promo. Please also delete these expense line items which are immaterial for most credit unions: Travel, Education, Loan Servicing, Professional, and Operating Fees.

Also, splitting out the Statement of Income and Expense by quarter would be helpful, to show quarterly data that totals the YTD information.

Embedded graphics and peer comparison tools would be a high value-add function.

Also, it would be helpful if the online program were more interactive and if like categories were grouped together. For example, if you want to see all data for Real Estate, you could click on the CU703 code and all the data would pop up, i.e. delinquencies, charge offs, and loan data on page 13.

Are the Call Report and Profile instructions adequate? If not, what improvements (overall and peculiar to specific items/schedules) would improve clarity and reduce reporting burden?

Adding examples for the more complex sections of the call report would be helpful. Also, making it easier to access the instructions would be more efficient. Our suggestion is to be able to click on a call report code and the instructions for that section would then appear onscreen.

Could re-organization of the Call Report or Profile reduce reporting burden? If so, please describe the needed changes. Does the Call Report contain elements that should be moved to the Profile? If so, please detail these elements. Does the Profile contain element that should be moved to the Call Report? If so, please detail these elements.

We would suggest that the CUSO information on the profile automatically updates when the CUSO section is filled in on the call report. Or remove the CUSO info from either the profile or the call report. Page 6, Miscellaneous Information should also be moved to the profile. Also, we would remove the potential members field, and make full-time employees 40 hours, and part-time equal to anything less than 40 hours.

Do you have any concerns or ideas about NCUA schedules/forms for collecting financial and non-financial information not addressed above?

There is a major issue when typing amounts in the call report form. For example, when you tab into a new cell to enter a number - if you don't first delete the 0, then the numbers that you type get jumbled. So do away with those default zeroes, or change the code to delete the zero with any input into the cell. It is very frustrating and causes reconciling issues if you don't catch it right away.

Also, it would be helpful if we could keep the warnings/error window open while editing the call report or profile. This would enable the user to reference the issues easier and more quickly. Also, automatically saving the form when exiting the warning/error window would be helpful. In the same manner, the user should be able to click on the narration of the warning or error and go right to that page.

The RBNW report on page 12 should be updated and automated for future RBNW calculations.

And, in general, all of the many input fields on the report should be reviewed for materiality and relevancy. If the input field is not applicable to most credit unions, is not material for most credit unions, and/or not of interest to most examiners, then get rid of it, to simplify the report and reduce both CU and Examiner information overload.

Thank you for the opportunity to provide feedback.

Regards,

Emily Le
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Amplify Federal Credit Union