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Christian Community
CREDIT UNION

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Mark Vaughan, NCUA, Office of Examination and Insurance 1775 Duke Street, Alexandria, VA 22314 CallReportMod@ncua.gov

Re: Call Report/Profile Content Modernization

Here are some responses to the questions you asked regarding the Call Report:

Q: What Specific areas of the Call Report/Profile forms do you find challenging to complete?

A: Perhaps the most difficult calculation is on Schedule A section 4 – Business Lending. Member Business Loans have a certain definition on the call report. MBLs are loans used for commercial purposes, but should not include, and I quote from the Call Report instructions:

"Loan(s) to a member or an associated member which, when the net member business loan balances are added together, are equal to less than \$50,000"

This is a difficult calculation to make and always requires a special process. A loan has to be combined with all other loans to the same borrower to determine which loans to include on the Call Report as MBLs. A loan could be considered an MBL one quarter, but not an MBL the next quarter because its balance falls below \$50,000 now. Additionally, our MBL balances on the call report are always lower than our commercial loans on our audited financial statement balance sheet because of the \$50,000 requirement.

Q: Are current Call Report account categories reasonably aligned with your internal accounting? If not, what changes would improve the alignment?

A: Total Assets on the call report are always higher than Total Assets on our own financial statements due to negative shares. Item number 16. "All Other Unsecured Loans/Lines of Credit" on Page 2 says to include negative shares, and I quote from the Call Report instructions:

"Also, report overdrawn share accounts of all types here"