Mark Vaughan, National Credit Union Administration  
Office of Examination and Insurance  
1775 Duke Street, Alexandria, VA 22314  

Re: Call Report/Profile Content Modernization  

Dear Mr. Vaughan;

The following represents our suggestions and/or comments regarding the Call Report/Profile Content Modernization. The 6 bulleted items below are those as disseminated by the NCUA requesting stakeholder input. Our comments are indicated under each bulleted item.

- What specific areas of the call report and credit union profile do users find challenging;  
  - MBL’s, the call report instructions – to include the rationale for the use of the information by the NCUA and/or Peers.
- What sections or items could be made optional for small or non-complex credit unions without compromising the agency’s ability to assess risk in these institutions;  
  - Not applicable to Freedom Credit Union
- What items could be added to the reports to enhance the agency’s analysis of the system’s performance trends;  
  - No comments
- What areas of regulatory reporting align with a credit union’s internal accounting and what areas do not;  
  - Most areas align with the internal accounting of the credit union. No areas noted that differ significantly.
- How the call report and credit union profile could be reorganized to reduce credit unions’ reporting burden; and  
  - The Call report sections based on MBL’s could be automated. Utilization of the AIRES report as an example whereby the download would be assigned by the NCUA to the appropriate fields. This would reduce classification differences and increase comparability.
  - There are also a few lines on page 6 the miscellaneous section that could be moved to the profile section, i.e. number of FTE’s, current members, share insurance company.
- What additional suggestions or ideas do credit unions have for collecting financial and non-financial information.  
  - No comments

Thank you for the opportunity to provide input.

Sincerely,
Freedom Credit Union

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