

March 15, 2018

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

RE: Comments Regarding Call Report/Profile Content Modernization

Dear Ms. Mary Thor,

Introductory paragraph:

I am writing on behalf of [Pearl Hawaii FCU], which serves [community chartered covering the Island of Oahu]. We have [23,997] members and [\$339,764,137] in assets. [Pearl Hawaii FCU] appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) regarding its request for information on Modernizing Data Collection for Supervision of Credit Unions.

Letter Body:

Are there account codes that are proposed to be retired that are still pertinent? If so, please provide the account code(s) and the reason for maintaining it.

No

Are there additional account codes that should be retired or consolidated? If so, please provide the account code(s) and the reason for retiring it.

NO

Are relocated account codes grouped logically? If not, please propose a location you feel is more logically suited.

Yes

Should any of the schedules be expanded to assist in analysis based on new rules or accounting changes? If so, please provide details of data the NCUA should also collect.

No

Are the instructions adequate in both content and design? If not, please cite specific sections that require improvement or correction.

Yes

What are the estimated costs to implement the proposed changes to the Call Report?

Not sure, if 3rd party vendors will pass on a portion of the cost of changes that affect all CU,

How much lead time do credit unions need to work with vendors to make changes to their systems to support such changes to the Call Report?

At least 6 months to give vendors adequate time to implement the changes.

Are there any other operational issues the NCUA should be aware of prior to implementing the proposed changes?

None

From your perspective, do you think this is a reduction in your reporting burden? Please explain.

Initial review shows that a lot of the loan reporting information has been removed and more information on the investment side has been requested

Summary of your position:

Implementation will take time and effort. Some cost maybe encountered .]

Closing paragraph:

Thank you for the opportunity to comment on this request for information and for considering our views.

Sincerely,

Gordon Sam
Board Chairperson
Pearl Harbor FCU

cc: CCUL