



*Experience the Advantage*

January 2, 2018

Amber Gravius  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314

**RE: Request for Information on Electronic Loan, Deposit, and Investment Data Collection**

Dear Ms. Gravius,

Advia Credit Union appreciates the opportunity to provide information solicited through the above request. We are a federally insured, state chartered credit union providing financial advantages to members across the Great Lakes region. We have reached \$1.6B in assets through strategic mergers and organic growth.

We have not prepared a response to all twelve queries presented in the register, but we would like to make note of some general concerns.

Advia works with multiple software platforms from several vendors in all areas of our business. In the lending area, for example, we utilize separate systems for commercial and consumer lending and have different systems for underwriting and our core system. We are concerned with the practicalities of reaching across all of these platforms to generate additional data not currently required, and with keeping that data uniform. We feel this will present unforeseen challenges both internally and to NCUA examiners. We are sure that Advia is not the only credit union in our peer group that uses multiple business systems.

Ultimately, we fear that increasing the number of required fields to over 90 in the lending area alone, could offset any gains made via reduction of onsite time or a longer examination cycle. We feel that a net increase in burden would be contrary to the spirit of the recently published NCUA Regulatory Reform Agenda.

We applaud the intent behind the request for information and we again thank you for the opportunity to share our thoughts.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Zack Fallstich', is written over a horizontal line.

Zack Fallstich  
Staff Attorney & Manager of Recovery