



MISSOURI CREDIT UNION ASSOCIATION

September 3, 2013

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428
OGCMAIL@NCUA.GOV

**RE: Don Cohenour - Comments on Notice of Proposed Rulemaking for Parts 741 and 748
Filing Financial and Other Reports**

Dear Mr. Poliquin:

On behalf of the 1.3 million credit union members, the Missouri Credit Union Association (MCUA) would like to take this opportunity to express our views on the National Credit Union Administration's (NUCA's) notice of proposed rulemaking for Parts 741 and 748, filing financial and other reports.

Currently, NCUA rules allow credit unions to file required reports manually. Manual filing may take the form of a report that is sent to NCUA by U.S. mail or facsimile. Virtually all federally insured credit unions already file their reports electronically, but 59 credit unions still file reports manually. The proposal would require all federally insured credit unions to file all required reports electronically.

It seems unlikely that the manual filings of 59 small credit unions place any kind of significant burden on NCUA's resources. Rather than a rule to require electronic filing, we think NCUA should encourage these credit unions to move toward electronic filing in a reasonable time, the duration of which should probably vary among these credit unions. If a formal rule on this subject is truly necessary, however, it should be flexible enough to allow credit unions that cannot for good reason file electronic reports to continue filing manual reports for a reasonable period of time, say up to nine months. Such authority should be approved by the credit union's NCUA regional director on a case-by-case basis.

As always, we appreciate the opportunity to respond to notice. We will be happy to respond to any questions regarding these comments.

Sincerely,

Don Cohenour
President

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