



*League of Southeastern  
Credit Unions & Affiliates*

September 3, 2013

Mr. Gerald Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke St  
Alexandria, VA 22314

Re: Comments on NCUA Notice of Proposed Rulemaking for Parts 741 and 748 / Filing Financial and Other Reports / RIN: 3133-AE25

Dear Ms. Rupp:

The League of Southeastern Credit Unions and Affiliates ("LSCU") appreciates the opportunity to comment on the National Credit Union Administration Boards ("NCUA") request for public comment on its proposal to require credit unions to file financial, statistical, and other reports and credit union profiles electronically using NCUA's information management system or other electronic means specified by NCUA. By way of background, LSCU is a credit union trade association, representing approximately 285 state and federal credit unions located throughout Alabama and Florida. These institutions currently serve the financial needs of over 6 million members.

The National Credit Union Administration (NCUA) is seeking to amend its regulations to require all federally insured credit unions (FICUs) to file financial, statistical, and other reports and credit union profiles electronically using NCUA's information management system or other electronic means specified by NCUA. Currently, NCUA rules allow credit unions to file required reports manually and online submissions are encouraged only if the institution has the capacity to do so. At this time the percentage of credit unions that continue to file their reports manually is very small and adoption of this proposal would require the remaining institutions to upgrade their reporting methods to include e-filing. LSCU supports the proposal requiring the use of e-filing by all federally insured credit unions and we do not view the rule as an obstacle to credit union operations.

We applaud NCUA's efforts to assist those credit unions with limited resources with donations of computer equipment and technical expertise. NCUA recently completed an initiative to provide free laptops and technical assistance to manual filers and these donations will no doubt make the transition smoother for many institutions. As you are aware, Section 741.6(a) of NCUA's regulations requires FICUs to file financial, statistical, and other reports, including call reports and Section 748.1 requires the

president or managing official of each FICU to certify compliance with a variety of requirements in its credit union profile. Under NCUA's current regulations, a FICU must use NCUA's information management system, or other electronic means specified by NCUA, to submit its reportable data online, unless it is unable to do so. At this time, a FICU not filing electronically must file written reports in accordance with NCUA instructions. The learning curve will be different for credit unions based on size, skill level, computer resources, etc. Based on these realities, we urge NCUA to consider approval of an implementation period of 6 to 9 months to allow credit unions making the transition to e-filing to make the move within a reasonable period of time. NCUA could monitor progress and supply additional assistance where and when it is needed to ensure the timeliness and accuracy of data.

In addition, we are aware of a recommendation put forth by the Self-Help Credit Union encouraging the Board to consider revising the required filing date for call reports. In their recommendation, Self-Help Credit Union supports changes that will result in the filing date for call report submission being revised to 30 days after each quarters end. We view this as a reasonable revision and one that would prove beneficial to all FICUs.

In closing, LSCU supports NCUA's efforts to improve its operating capabilities and reduce the costs associated with credit union data management. We see the adoption of the proposal as a positive for FICUs and do not foresee any unintended negative consequences. In addition, such a step would release resources at the agency that are now used to review manually submitted reports and other information from non e-filing institutions. However, we also believe that assistance should be directed to credit unions that lack the technical resources or expertise necessary to report critical financial data effectively as would be required by the agency's proposal. Consideration of an alternate call report due date would be greatly appreciated also.

Thank you for the opportunity to comment on NCUA's request for public comment on its proposal to require e-filing of financial reports and other information. If you have any questions concerning our letter, please feel free to contact me directly at (205) 437-2165.

Sincerely,



Scott Morris  
Director of Regulatory Compliance

