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March 19, 2015

Mr. Gerald Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428

RE: Comments on Request for Comment on Economic Growth and Regulatory Paperwork Reduction Act (EGRPRA); Docket No. NCUA-2014-0044-0001

Dear Mr. Poliquin,

The Georgia Credit Union League (GCUL) appreciates the opportunity to respond to the Request for Comment on the Economic Growth and Regulatory Paperwork Reduction Act (EGRPRA). As a matter of background, GCUL is the state trade association and one member of the network of state leagues that make up the Credit Union National Association (CUNA). GCUL serves approximately 136 Georgia credit unions that have over 2 million members. This letter reflects the views of our Regulatory Response Committee, which has been appointed by the GCUL Board to provide input into proposed request for comments such as this.

Georgia credit unions greatly appreciate NCUA's voluntary evaluation to identify outdated, unnecessary, or burdensome regulatory requirements imposed on federally insured credit unions as part of the agency's decennial EGRPRA regulatory review. While at the CUNA Governmental Affairs Conference, Chairwoman Matz mentioned that 2015 would be "the year of regulatory relief." Using that as a guide, we would recommend that as NCUA reviews the category "Under Consumer Protection – Uninsured Membership Shares" 12 CFR 741.9 that NCUA look to alleviate some of the reporting burden currently placed upon credit unions. Uninsured member shares are calculated at the end of each quarter and reported on the 5300 Call Report. Our credit unions state that currently, this long and tedious process takes between 3-5 days to complete. Credit unions would appreciate changing the process to make it simpler to calculate, with less manual work. This would help with time management and staff allocation for credit unions. If that is not possible, an alternative suggestion would be to require credit unions to report this information annually instead of quarterly.

Furthermore, there has been growing discussion among credit unions and NCUA on ways to either increase field of membership (FOM) additions or decrease the paperwork required for a credit union expansions to make the process easier for credit unions to grow their FOMs.

Currently, community credit unions can only merge with another community credit union or a credit union within the existing community. NCUA's Merger Manual For Credit Unions states...“Community chartered CU merging into a community chartered FCU - The merger is permissible if—

- The merging CU's boundaries are entirely within the continuing FCU's boundaries;
- The continuing FCU meets the criteria for expanding its boundaries to include the merging CU's boundaries;
- A majority of the merging credit union's field of membership would qualify for membership in the community chartered FCU; or
- It is an emergency merger.”

It is our understanding that if the community credit union wishes to merge with a SEG-based credit union outside their community; the community credit union must first convert back to a multi-SEG credit union. Only then would they be allowed to merge with another multi-SEG credit union. This is extremely limiting and time-consuming for community credit unions seeking possible merger partners. We would like to recommend that NCUA look at amending its policy in order to allow community credit unions to seek merger partners based on what is best for the membership. We feel that the surviving credit union's FOM is what is of importance here. This would allow a community credit union to talk to multi-SEG based credit unions as possible merger partners based on comparable credit union philosophies – not because this is the only solution that NCUA allows.

Chairwoman Matz has also stated that NCUA was reviewing ways to help credit unions be more competitive with their member business loans. We strongly support changing the current requirement that necessitates a personal guarantee for Member Business Loans (MBL). We believe this is too restricting and would like to see this requirement removed so that credit unions can be more competitive for these loans. Per Part 723.7(b) “Principals, other than a not for profit organization as defined by the Internal Revenue Service Code (26 U.S.C. 501) or those where the Regional Director grants a waiver, must provide their personal liability and guarantee.” While a waiver is possible under Part 723.10, it is a lengthy process and one that we don't believe should be mandatory in the first place.

GCUL appreciates the opportunity to present comments on behalf of Georgia's credit unions. Thank you for your consideration. If you have questions about our comments, please contact Selina Gambrell or Cindy Connelly at (770) 476-9625.

Respectfully submitted,



Selina M. Gambrell
Compliance Specialist