



November 21, 2005

Mary F. Rupp  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314-3428

Re: Comments on Proposed Rule Section 741.6

Dear Ms. Rupp:

I am writing on behalf of the National Association of Federal Credit Unions (NAFCU), the only trade association that exclusively represents the interests of our nation's federal credit unions, in response to the National Credit Union Administration's (NCUA) request for comment on its proposal to amend 12 C.F.R. § 741.6 to require all federally insured credit unions to file the same quarterly Financial and Statistical Report with NCUA, a newly revised Form NCUA 5300, regardless of an insured credit union's asset size.

NCUA has stated that the revised Form 5300 consolidates information, reduces ancillary schedules and is easier to read and use. The agency has also stated that the revised form will decrease the compliance burden on credit unions completing the current Form 5300 and at the same time increase efficiency and provide benefits to NCUA. NAFCU agrees with the proposed changes and believes that they will increase the agency's efficiency, increase the accuracy of the information collected, and simplify the reporting process for many credit unions.

NAFCU, however, is concerned that small credit unions currently permitted to file a short form twice yearly will bear additional reporting burdens due to the longer Form 5300 and the increased amount of data required to complete it. NAFCU supports the proposed revisions to the financial and statistical reporting form, but urges NCUA to provide small credit unions with ample time to prepare for the revised requirements and to be flexible during the rule implementation process. NAFCU would support the proposed implementation date of September 2006, if the revised form is approved and made available before the end of 2005. However, if the form is not available until 2006, NAFCU would support an implementation in the first quarter of 2007 or later. NAFCU

Ms. Johnson

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also encourages the agency to continue to identify means for streamlining the reporting process.

NAFCU applauds the agency's efforts to reduce the regulatory burden on the nation's credit unions and thanks you for this opportunity to share its views on this proposed rule. Should you have any questions or require additional information, please call me or Bill Hall, NAFCU's Associate Director of Regulatory Affairs, at (703) 522-4770 or (800) 336-4644 ext. 268.

Sincerely,



Fred R. Becker, Jr.  
President/CEO

FRB/whh