



April 2, 2018

Ms. Mary Thor  
National Credit Union Administration  
Office of Examination and Insurance  
1775 Duke Street  
Alexandria, VA 22314-3428

**Re: *Comments on Call Report/Profile Content Modernization***

Dear Ms. Thor:

The Pennsylvania Credit Union Association (PCUA) appreciates this opportunity to comment on the National Credit Union Administration's (NCUA) Call Report Modernization proposal. PCUA is a state-wide advocacy organization that represents a majority of the nearly 400 credit unions located in the Commonwealth of Pennsylvania. We and our member credit unions welcome NCUA's efforts to improve the Call Report and Profile.

We understand the importance of the Call Report data to risk supervision of credit unions and ultimately protecting the National Credit Union Share Insurance Fund. We also commend NCUA for preparing for the accounting changes that will come with the Current Expected Credit Losses (CECL) method and accommodating those credit unions that have adopted CECL early.

We surveyed our credit unions on the proposed changes and received responses from credit unions ranging in asset size from \$18 million to over \$600 million. Overall, the majority of the credit unions that responded believe the changes are a step in the right direction at improving the Call Report and Profile, but feel that more changes are necessary.

The overwhelming majority responded that none of the account codes proposed to be retired are still pertinent. About half of those responding believed there were additional account codes that should be retired or consolidated; however no specific codes were identified. One commenter suggested that the commercial/business account codes should be consolidated as the vast number of codes can lead to reporting errors.

A majority of credit unions also indicated that the relocated account codes were grouped logically in the proposed Call Report. One commenter did suggest that the investment and loan fields could still use some improvement as the current organization does not allow for a good flow of information.

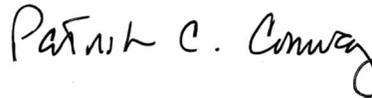
Nearly all of our responding credit unions agreed that no schedules needed to be expanded to assist in analysis based on upcoming rule changes and accounting methods. Our credit unions were evenly split on whether the instructions were adequate. One of our credit unions suggested that the new investment and reporting fields were not well defined in the instructions. For example, for the Risk-based net worth fields, rather than citing to the rule, the instructions should explain the required input.

Due to the extensive changes being proposed to the Call Report and Profile, credit unions would necessarily need time to prepare and test their data. The suggested amount of lead time from our member credit unions was anywhere from six months to two years to adequately prepare for the changes. Based on the variety of responses we received we would recommend a lead time of at least one year and not more than two years.

**Conclusion**

PCUA and its member credit unions encourage NCUA to continue to make improvements to the Call Report and Profile. While the current reductions are a good start, our credit unions indicate that there are still many improvements that could be made, including eliminating more duplicative reporting fields and improving the flow of information on some of the pages.

With best regards,

A handwritten signature in black ink that reads "Patrick C. Conway". The signature is written in a cursive style with a large, looped "C" at the end.

Patrick C. Conway  
President & CEO

cc: Association Board  
Government Relations Committee  
Regulatory Review Committee  
State Credit Union Advisory Committee