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August 04, 2016

Mr. Mark Vaughn
Director, Division of Analytics and Surveillance
Office of Examination and Insurance
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

Re: Call Report/Profile Content Modernization

Dear Mr. Vaughn:

On behalf of San Antonio Federal Credit Union (SACU), I am writing in response to the request for information filed in the Federal Register on June 7, 2016 regarding "Call Report and Profile Content Modernization." SACU welcomes the opportunity to provide input on ways the National Credit Union Administration can modernize and improve its Call Report.

SACU offers the following two suggested improvements:

Page 7: Delinquent Loans by Collateral Type

Under this section it is recommended that Government Guaranteed Loans assume their own line item, such as that of "Non-Federally Guaranteed Student Loans." As noted in the Risk-Based Capital Ratio, these loans generally do not carry a high risk for the credit union, therefore, placing these government guaranteed loans in the "All Other Loans" category misrepresents the risk associated with their delinquency.

Page 8: Additional Delinquency Information

The detail breakdown of the delinquency reported on Page 8, is unnecessary given the information reported on Page 7 of the report. Therefore, it is recommended the information required in this section is streamlined or consolidated with the information requested on Page 7.

SACU appreciates the efforts taken by the NCUA to modernize the requested content of the Profile and Call Report. Again, thank you for the opportunity to comment; we hope that you find our

suggestions for improvement useful. Should you have any questions or concerns, please feel free to contact me at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "Alexander M. Padgett". The signature is fluid and cursive, with the first name "Alexander" being the most prominent part.

Alexander Padgett
Controller
SACU
210.258.1487