



VIA EMAIL

Mark Vaughan
National Credit Union Administration
Office of Examination and Insurance
1775 Duke Street
Alexandria, VA 22314
CallReportMod@ncua.gov

Re: Modernizing Data Collection for Regulatory Oversight of Credit Unions

Dear Mr. Vaughan,

The Wisconsin Bankers Association (WBA) is the largest financial trade association in Wisconsin, representing approximately 270 state and nationally chartered banks, savings and loan associations, and savings banks. WBA appreciates the opportunity to comment on the National Credit Union Administration's (NCUA's) notice on modernizing data collection for regulatory oversight of credit unions.

WBA generally supports NCUA's stated overarching goal to: strengthen on-site examination and off-site monitoring by NCUA and state supervisory authorities—such as by Wisconsin's Department of Financial Institutions; and facilitate richer comparisons of institution and industry trends by other parties. We believe today's electronic technologies utilized by both supervisory authorities and financial institutions can easily be the means to collect and report data effectively and efficiently.

Within the notice, NCUA poses the question: what specific items would you like to see added to the Call Report/Profile to enhance analysis of local, regional and national performance trends or improve comparisons of individual credit unions with peer institutions? WBA believes NCUA *must* take this opportunity to require credit unions to report the same information within their Call Reports—to the same level of specificity—as banks must report within their Call Reports. We believe uniformity of Call Report data reporting is *the only way* in which NCUA can accomplish its stated goal to facilitate richer comparisons.

For example, a small FDIC-insured community bank in Wisconsin is required to report its summary of branch deposits annually. However, a small NCUA-insured credit union with the same asset base serving the same geographic location(s) as the FDIC-insured bank is not required to file a summary of branch deposit report. So as to "facilitate richer comparisons of institution and industry trends by other parties" WBA believes NCUA *must* require NCUA-insured credit unions to report their summary of branch deposits just as FDIC-insured banks are required to report branch deposit data. Such data is equally important to the public, industry analysts and regulatory agencies—regardless of charter or asset size.

While the example is just one of many, it demonstrates that for NCUA to satisfy its goal to facilitate richer comparisons of institution and industry trends, NCUA must require credit unions to report the same information within their Call Reports, to the same level of specificity, that banks must report within their Call Reports; it will provide transparency of data for the public, industry analysts and regulatory agencies alike.

Once again, WBA appreciates the opportunity to comment on NCUA's notice on modernizing data collection for regulatory oversight of credit unions.

Sincerely,

A handwritten signature in black ink, appearing to read "Rose Oswald Poels".

Rose Oswald Poels
President/CEO

