



August 27, 2013

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

Re: Comments on Notice of Proposed Rulemaking for Part 741 and Part 748
Filing Financial and Other Reports

Dear Ms. Rupp,

Please accept this brief comment on behalf of Self-Help Credit Union and Self-Help Federal Credit Union (collectively "Self-Help"). Self-Help serves nearly 100,000 members out of its two credit unions and their branches in California, North Carolina and Chicago. Self-Help has over \$1 billion in member shares and deposits and nearly \$1.2 billion in total assets.

Self-Help has no objection to NCUA's proposal to require electronic filing of all call reports and related information. Such a requirement may place some burden on very small credit unions whose records are still kept manually. However, we believe that NCUA has taken reasonable efforts to provide resources to those credit unions to strengthen their ability to use the internet as a means of filing their reports.

At the same time, we would request that the Board use its authority under 12 U.S.C. 1756, 1766, 1781, and 1782 to change the required filing date for call reports to 30 days after quarter-end. Such a deadline is consistent with the long-standing call report deadline requirement of thrifts and banks under FDIC policy¹. We do not see any reason why credit unions should have a different reporting burden.

Both call reporting requirements and credit unions have become more complex in recent years, while the filing deadline has not been adjusted to reflect the additional burden. To cite a recent example of complexity, in response to changes in GAAP related to merger accounting, NCUA requires credit unions to report the "accretable" and "nonaccretable" difference associated with credit-impaired acquired loans. Self-Help agrees that it's appropriate for NCUA to request most of this information, including the discount associated with such loans. However, we would ask that the Board acknowledge that managing such information and breaking it out for reporting to NCUA is substantial, and therefore, push back the reporting deadline consistent with banks and thrifts. We believe the Board's authority to make such a change does not require a formal rule-making, and thus, could be implemented immediately.

Sincerely,

A handwritten signature in blue ink, appearing to read "Randy Chambers".

Randy Chambers
Chief Financial Officer

¹ See http://www.fdic.gov/regulations/resources/call/crinst/2013-06/613Inserts_063013.pdf