



July 26, 2016

Mr. Mark D. Vaughn
Director, Division of Analytics and Surveillance
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Re: NCUA's Request for Comments on Improving the Call Report System and Credit Union Profile

Dear Mr. Vaughn,

Leominster Credit Union appreciates the opportunity to comment on ways to modernize and improve the Call Report system and the Credit Union Profile. By way of background, Leominster Credit Union is a state-chartered credit union located in central Massachusetts with approximately 50,000 members and \$640 million in assets.

The Call Report represents one way in which the NCUA evaluates a credit union's financial performance and risk profile. However, it asks for information which does not seem to serve its stated purpose. Instead, the collection of this information only increases the overall reporting burden. For example, under the title of "Miscellaneous Information," the Call Report asks for the number of members who use the credit union website, and amount of grants awarded and received. We respectfully suggest the NCUA review the Call Report and ensure that only data which contributes to the stated purpose is included.

Similarly, there is some information that is reported on more than once. For example, Credit Union Service Organizations (CUSOs) are included on the Call Report and on the Profile. Also, as the NCUA is aware, beginning in 2016 credit unions must register and report on CUSOs through the CUSO registry.

Respectfully, it is suggested that updates to the Call Report be designed to make it more intuitive and allow for information to be pre-populated as applicable. This would allow for areas of the Call Report which are not pertinent to be bypassed altogether, as well as increasing efficiencies by eliminating the need to re-enter the same information multiple times.

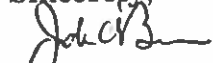
Clearer instructions, particularly relative to the definitions of certain terms, would improve the Call Report. Specifically, a definition of how to calculate the number of "potential members" would be helpful and ensure consistency among all credit unions.

In the statement of financial condition, interest rates are required for both loans and deposits. These rates would be more meaningful if they were weighted average rates for each category, rather than "the most common rate in each category," as the instructions currently read.

Lastly, extending the due date for submission of the Call Report to the end of the month would significantly reduce the burden each quarter. The current due date makes it difficult to complete this complex reporting requirement, given various holidays occurring in the first month of most calendar quarters. Extending the due date would allow the credit union industry to achieve parity with the banking industry.

Leominster Credit Union supports the NCUA initiative to modernize the Call Report and decrease the reporting burden on credit unions. Thank you for the opportunity to comment. If you have any questions please do not hesitate to call at 978-466-7222.

Sincerely,



John O'Brien

President and CEO

Leominster Credit Union