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Public Comments on Requests for Information: Modernizing Data Collection for Regulatory Oversight of Credit Unions:=====

Title: Requests for Information: Modernizing Data Collection for Regulatory Oversight of Credit Unions

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Comment: When looking at the CALL report for a CU and comparing with a Bank, we do things differently when it comes to repricing of assets. CU's drop all consumer loans into short term and business loans are long term. Then investments are long term if over three years. Plus then to make it worse, you consider your fixed assets in this category no matter the remaining life. Net long term asset ratio is a horrible measure of risk.

Why would we not analyze our risk based on maturity of all. If a CU is booking ten year car loans, I realize that loan has an average life of less than three years in most cases. However, if you truly want to understand the credit unions risk in a rising rate environment, you would stratify the maturities out further by the remaining life not the initial term or category they were put on the books in. A bank CALL takes into account all remaining maturities. So if you commercial loans in the less than three year range, they are not long term assets. i.e. Less than one year, 1-3 years, 3-5 years, etc.

Thanks for your time.

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