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January 27, 2017

Office of Information and Regulatory Affairs
Office of Management and Budget
Attention: Desk Officer for NCUA
New Executive Office Building
Room 10235
Washington, DC 20503

NCUA PRA Clearance Officer
1775 Duke Street
Suite 5067
Alexandria, VA 22314

Re: NCUA Call Report and Profile

Dear Ladies and Gentlemen:

The Independent Community Bankers of America (ICBA)¹ appreciates the opportunity to provide comment on the Office of Management and Budget (OMB) review and comment request for revisions made to the NCUA call report and profile under forms 5300 and 4501A.

ICBA is concerned that credit unions may be intentionally or unintentionally exceeding the statutory member business lending cap of 12.25% of total assets without the NCUA being aware of it. Therefore, in order to allow the public and the NCUA to track whether credit unions remain in compliance with the law, ICBA requests that the NCUA call report be amended to include a separate schedule for reconciling credit union member business loans and commercial loans against all statutorily mandated lending caps. The schedule should note total member business loans by loan type with separate identification of those loans that are subject to a specific asset cap and those that are not subject to an asset cap. The schedule should also note total commercial loans by loan

¹ The Independent Community Bankers of America®, the nation's voice for nearly 6,000 community banks of all sizes and charter types, is dedicated exclusively to representing the interests of the community banking industry and its membership through effective advocacy, best-in-class education and high-quality products and services.

With 51,000 locations nationwide, community banks employ 700,000 Americans, hold \$3.9 trillion in assets, \$3.1 trillion in deposits, and \$2.6 trillion in loans to consumers, small businesses, and the agricultural community. For more information, visit ICBA's website at www.icba.org.

The Nation's Voice for Community Banks.®

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type with separate identification of those loans that are subject to a specific asset cap and those that are not subject to an asset cap. The schedule should separately show the credit union's available lending capacity for those member business loans and commercial loans that are subject to a statutorily mandated lending cap. When a credit union has exceeded one or more lending caps, the total dollar amount of loans that exceed the cap should be noted.

Without this critical information tracked in the call report, tax-exempt credit unions can more easily circumvent the statutory business lending cap, thereby engaging in illegal lending in direct competition with tax-paying community banks. ICBA appreciates the opportunity to comment on the proposal. If you have any questions or would like additional information, please do not hesitate to contact James Kendrick at james.kendrick@icba.org.

Sincerely,

/s/

James Kendrick
First Vice President, Accounting and Capital Policy

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