

# PUBLIC SUBMISSION

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Anonymous Comment

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## Submitter Information

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## General Comment

Regarding the additional three accounts to Schedule D, Section 3 for maturity distribution of total uninsured shares and deposits.....

The programming and calculations involved to report these amounts will be very burdensome. Is there any guidance to determine a hierarchy for uninsured deposits? For example, I have a single account with no beneficiaries that includes \$200K in savings and another \$200K in a CD maturing in 15 months. Which \$150K part of that uninsured money is to be categorized in either <1 year or 1-3 year maturity bucket? If there is no rule, then how consistent will reporting be across credit unions? I doubt this information will be of any value and will fall short of evaluating depositor behavior and the movement between uninsured non-maturity shares and share certificates.