From: <u>Jay Stiles</u>
To: <u>PRA Comments</u>

Cc:Doug Holmes; Rachael Mosca; Karl GromSubject:[External] OMB Control Number 3133-0004Date:Friday, November 8, 2024 2:44:06 PM

Hello,

I am responsible for the creation and maintenance of the tool that calculates uninsured share balances for BCU.

Regarding the proposed changes for March of 2024 requiring maturity levels for Uninsured Shares in our reporting:

Since insurance is aggregate by tax id (one person only gets 250k per asset type... business/IRA/Trust/Personal) how should uninsured shares be reported for the following scenario under the proposed change:

A member has four open CDs with different maturity ranges, each containing \$100,000. The member in aggregate would have \$150,000 in uninsured dollars. Which of the CDs should be considered "uninsured" in this case – for reporting purposes. Should the youngest CD get insurance first? The oldest?

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