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To: [PRA Comments](#)
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As to the March 2025 call report proposed changes, please consider the following:

Page 19, Schedule D | Section 2

The bifurcation of brokered non-maturity shares/deposits and term shares/deposits.

- The instructions clearly do NOT indicate certificates, which is likely what is intended under the header Term Shares. Much of our deposits are institutional money in some form or fashion. Merely calling it brokered in the instructions will not assure that they will be reported there without more clear and concise language differentiating shares vs certificates, this ambiguity will lead to inconsistent reporting amongst credit unions.

Cordially,

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