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Agency Information Collection Activities; Proposals, Submissions, and Approvals

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Comment from Beverly , Ryan

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General Comment

Regarding the reporting of maturities for Uninsured Shares, could the Agency consider a materiality limit? I completely understand, from a risk perspective, why this information could be important, but for a credit union with say 5% or less of their shares uninsured, how material can the risk be? Currently our system is not capable of easily gathering what is most likely immaterial information. The extra time and effort needed to calculate the maturities seem excessive in relation to the materiality of information gathered.