

From: [Robert Leonardi](#)
To: [PRA Comments](#)
Subject: [External] Comment on Revision of Agency Information Collection of a Previously Approved Collection: Request for Comments
Date: Tuesday, January 14, 2025 11:44:39 AM

Good morning,

I wish to submit a public comment regarding the 2025-Q1 Call Report Changes. In the Federal Register Volume 89, No. 249, published on Monday, December 30, 2024, the following was included for Schedule D, Section 3:

“One commenter stated the reason NCUA provided for adding these accounts was not sufficient. Regulators and industry analysts cite uninsured deposit runoff as a contributing factor in postmortem assessments of the 2023 banking failures. Uninsured deposits are not as important to the funding mix for credit unions as they are for banks; however, the amount of uninsured shares has been increasing in the credit union system. Trends in uninsured depositor behavior can signal emerging risks to credit union system stability and the share insurance fund.”

Silicon Valley Bank (\$200+ billion in Total Assets), Signature Bank (\$100+ billion in Total Assets), and First Republic Bank (\$200+ billion in Total Assets) were the three bank failures in 2023 where uninsured deposits were a contributing factor to their failure. Publicly traded commercial banks of this size should not be compared to credit unions nor should the failure of these banks be used to create more reporting burden for smaller credit unions. Setting a minimum threshold of \$10 billion in Total Assets for this reporting would alleviate reporting burden for smaller credit unions while still providing uninsured depositor data.

Respectfully,
Robert

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