



**National Association
of Federal Credit Unions**
3138 10th Street North
Arlington, VA 22201-2149

NAFCU | Your Direct Connection to Education, Advocacy & Advancement

May 29, 2013

Tracy Crews
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

RE: NCUA-2013-0024-0001; Generic Clearance for the Collection of
Qualitative Feedback on Agency Service Delivery

Dear Ms. Crews:

On behalf of the National Association of Federal Credit Unions (NAFCU), the only trade association that exclusively represents federal credit unions, I am writing to you regarding the National Credit Union Administration's (NCUA) request for comment on the Generic Clearance for the Collection of Quantitative Feedback. As a preliminary matter, NAFCU and its members appreciate any attempt by the NCUA to listen to stakeholders and use that feedback to better serve credit unions. We have concerns about the usefulness of this information and the accuracy of the burden hours projected given how vague the request for comment is. We are apprehensive about adding additional requirements for response to the ever-increasing regulatory burden already facing credit unions.

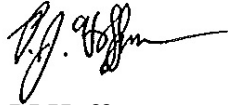
As you know, our nation's credit unions are struggling under an ever-increasing regulatory burden. A survey of NAFCU members late last year found that 94% have seen their regulatory burden increase since the passage of the *Dodd-Frank Act* in July 2010. Credit unions, many of which have very small compliance departments, and in some cases only one compliance officer, must comply with the same rules and regulations as our nation's largest financial institutions that employ armies of lawyers. The impact of the ever-increasing regulatory burden is even more sobering, as the number of credit unions continues to decline. There are nearly 700 fewer credit unions today than there were before the passage of the *Dodd-Frank Act*.

In this request for comment, the NCUA seems to be asking for the ability to request feedback from stakeholders about the service provided to them by the NCUA. The request for comment is too vague as to what exactly will be collected and what that process will entail. A more specific explanation of the proposed information collection is needed to make a determination as to how useful it will be for the NCUA. This request also projects an estimate of 2,250 aggregate burden hours over the next three years. It is impossible for commenters to assess the accuracy of projected burden hours and how it will affect credit

unions without knowing more specifics about what the requests for feedback will have in them.

Thank you for your continued commitment to listen to feedback and looking for new ways to further enhance your approach to serving credit unions. Should you have any questions or would like to discuss these issues further, please feel free to contact me at PJHoffman@nafcu.org or (703) 842-2212.

Sincerely,

A handwritten signature in black ink, appearing to read "P.J. Hoffman", with a long horizontal flourish extending to the right.

PJ Hoffman
Regulatory Affairs Counsel