



## eDOC INNOVATIONS

September 3, 2015

Gerard Poliquin, Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexander, VA 22314-3428  
Email: [regcomments@ncua.gov](mailto:regcomments@ncua.gov)

Re: Comment on the Proposed Amendment to the CUSO Regulation

Dear Mr. Poliquin,

eDOC Innovations is submitting comment to the Information Collection Activities Request for Comment, dated July 6, 2015, in the Federal Register. I have just recently been made aware of this request, and therefore the first comment I have is that this request is not generally known by leaders of credit unions and CUSOs, and should have been disclosed with greater publicity.

We understand that the agency is building an internet portal for a CUSO's submission of reporting data. We support this model for reporting submissions, and encourage NCUA to provide education and disclosure for this reporting tool with publicity, and with a sufficient preparation period for CUSO's to comply. As we are unaware of the specific requirements related to this portal system, it is no possible to respond on how long it will take to comply with annual report submissions.

Relating specifically to the reporting requirement itself, we are very concerned about the proprietary nature of information such as company financials and client lists, which represent valuable company information and which, if compromised, could harm the company's competitive position in the market. Therefore, we strongly suggest that reporting data be; 1) protected by industrial level encryption and security measures, 2) not be available for transport through thumb drives or local disk drives on laptops, and 3) exempted from FOIA requests as confidential business information, incidental to the examination of credit unions. These three critical areas of concern we believe represent reasonable business concerns that must be addressed by NCUA.

Thank you for providing this comment period. We recommend the agency extend the comment period, providing greater publicity, thereby allowing other industry leaders to comment on this important issue. If I can be a source of any further information on this matter, please do not hesitate to contact me.

Sincerely,

Bret Weekes  
President & CEO