

October 29, 2019

National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314

RE: Comments on Proposed Information Collection: Records Preservation

Dear Ms. Mackie Malaka,

Introductory paragraph:

I am writing on behalf of Pearl Hawaii FCU, which serves the community of the Island of Oahu. We have 29,497 members and \$374,436,778 in assets. Pearl Hawaii FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed information collection request regarding records preservation.

Letter Body:

Do you agree with the NCUA's estimate that each FICU will annually spend two hours complying with the requirements of Part 749's records preservation program? Why or why not?

This estimate is grossly understated. The annual review and revision of the document retention program and policy in itself may take 2 hours. The maintenance and review of applicable repository system and the purging of documents will likely take considerable time annually as well and the maintenance of destruction logs that are performed in dual control.

Are there any records included in Appendix A to Part 749 that should have their record retention guidelines updated? If so, which records, why, and what length of time to you recommend?

NO

Have you experienced any exam issues related to Appendix A to Part 749 record retention guidelines? If so, please explain the issue.

NO

Summary of your position:

[Write the summary of your position here.]

Closing paragraph:

Thank you for the opportunity to comment on the proposed information collection request regarding records preservation and for considering our views.

Sincerely,

Gordon Sam  
Board Chairperson  
Pearl Hawaii FCU

cc: CCUL