



Jim Nussle
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June 11, 2019

The Honorable Vicente Gonzalez
U.S. House of Representatives
Washington, DC 20515

The Honorable Brad Sherman
U.S. House of Representatives
Washington, DC 20515

The Honorable David Scott
U.S. House of Representatives
Washington, DC 20515

The Honorable Josh Gottheimer
U.S. House of Representatives
Washington, DC 20515

The Honorable Henry Cuellar
U.S. House of Representatives
Washington, DC 20515

The Honorable Blaine Luetkemeyer
U.S. House of Representatives
Washington, DC 20515

The Honorable Roger Williams
U.S. House of Representatives
Washington, DC 20515

The Honorable French Hill
U.S. House of Representatives
Washington, DC 20515

The Honorable Barry Loudermilk
U.S. House of Representatives
Washington, DC 20515

The Honorable Ted Budd
U.S. House of Representatives
Washington, DC 20515

Dear Representatives Gonzalez, Sherman, Scott, Gottheimer, Cuellar, Luetkemeyer, Williams, Hill, Loudermilk, and Budd:

On behalf of America's credit unions, I am writing to express our support for your legislation, "To require the Securities and Exchange Commission and certain Federal agencies to carry out a study relating to accounting standards, and for other purposes." The Credit Union National Association (CUNA) represents America's credit unions and their 115 million members.

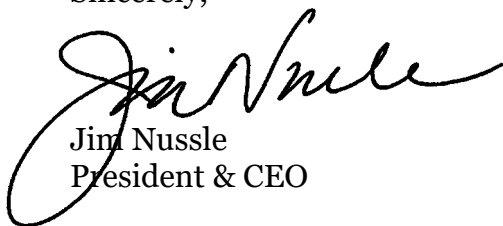
CUNA's longstanding position has been and continues to be that application of CECL to credit unions is inappropriate. CECL is intended to address delayed recognition of credit losses resulting in insufficient funding of the allowance accounts of certain covered entities. However, underfunding of allowance accounts has not generally been an issue for credit unions. Further, the typical user of a credit union's financial statements is not a public investor—such as with large, public banks—but instead is the credit union's prudential regulator, the National Credit Union Administration (NCUA).

At a minimum, we believe that it is essential to delay implementation of CECL in order to conduct an analysis on the impact it would have and allow time for alternatives to be considered. It would also allow our regulator to better understand and address the consequences implementation of CECL may pose. As such, CUNA thanks you for introducing

legislation that would delay implementation of CECL and require the Securities and Exchange Commission and Federal financial regulators in conjunction with the Financial Accounting Standards Board to conduct a study on the impact of implementation.

On behalf of America's credit unions, thank you for your leadership on this important issue. We look forward to working with you as the bill moves through the legislative process.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Nussle". The signature is fluid and cursive, with a large loop at the end of the "e".

Jim Nussle
President & CEO