

August 28, 2019

Financial Accounting Standards Board
FASB Technical Director
401 Merritt 7
Norwalk, CT 06856-5116

RE: Comments on Effective Dates; File Reference No. 2019-750

Dear Technical Director,

Introductory paragraph:

I am writing on behalf of Clark County Credit Union, which serves city & county employees along with the medical field. We have 45,000 members and \$820,000,000 in assets. CCCU appreciates the opportunity to provide comments to the Financial Accounting Standards Board (FASB) on its proposed Accounting Standards Update (ASU) regarding a change in philosophy regarding effective dates and its application to the effective dates for the following major ASUs: current expected credit losses (CECL) (*Topic 326*), Leases (*Topic 842*), and Hedging (*Topic 815*).

I am in favor of postponing the implementation of CECL. The delay will allow for more extensive testing to occur in order to properly determine which methodology to use for the various loan classes. There are many ways to skin this cat and allowing us as much time as possible to properly predict which methodologies are appropriate is requested.

Based on the scenarios we have considered to date, it appears that our reserves will increase significantly, potentially up to 2.5x more. The additional time will allow us adequate time to properly prepare for these reserves and how they will affect us financially as a credit union.

Finally, the delay in implementation will allow for additional data to be gathered / collected in a normalized financial environment. One challenge is deciphering what a "normal economy". Using a ten year historical lookback includes a part of the great recession (the worst economic times in almost 100 years), followed by the great recovery (one of the most robust economies ever). The current economic conditions appear to be normalizing and will allow a realistic look back scenario which will allow us to more accurately predict how the future economy may perform.

Thank you for the opportunity to comment.

Sincerely,

Josh Haldeman
CLO
Clark County CU

cc: CCUL