

August 26, 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 L.E.O. Credit Union, which serves employees, family members, contractors and their family member and retirees of the Lubizol Corporation. We have almost 2000 members and 13,900,000.00 in assets. L.E.O. Credit Union 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 support the delaying the CECL effective date to January 2023. This give the smaller market credit unions more time to understand how CECL works and how it needs to be implemented. I've attended several workshops, seminars, and webinars regarding CECL and it's still very confusing. Perhaps another year of "tweaking" CECL will make implementation easier to understand and apply.

I still cannot grasp the idea of including reasonable and supportable "forecasts" in our CECL data. How is one to predicate something in the future?

The U.S. economy was going "gung-ho" and then the tax tarrifs hit, causing the stock market to tank and the Fed's to lower interest rates. Who would have predicated that? Isn't that the same with predicting a loan loss. At our credit union....We don't make bad loans. Loans go bad.

I support the CECL effective date delay to January 2023.

Thank you for the opportunity to comment on the proposed ASU regarding effective and for considering our views.

Sincerely,

Beth Patla  
Chief Executive Officer  
L E O Credit Union Inc

cc: CCUL