September 12, 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 Pearl Hawaii FCU which serves the Community of the Island of Oahu. We have 29,460 members and $374,044,314 in assets. Pearl Hawaii FCU 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).

Letter Body:

Do you support delaying the CECL effective date to January 2023 (from January 2022)? Why or why not?

Yes I support the decision to delay the effective date of the RBC rules. It appears that there is sufficient evidence to support the argument that this change will not have a significant effect on the majority of credit union.

The FASB is adopting a new effective date philosophy for major standards updates – that is, a major standard update would first be effective for larger public companies and for all other entities the Board would consider requiring an effective date staggered at least two years later. Do you support this effective date philosophy? Why or why not?

Yes, the larger public companies already have a mature CECL program in place and any changes required by a major standard update would be an incremental one. The credit union industry on the other hand is tasked with much more in the adoption of a new standard, management system and increases in allowances

Do you have other comments or recommendations regarding the implementation date for CECL?

None

Summary of your position:

[Write the summary of your position here.]

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

Sincerely,

Gordon Sam
Board Chairperson
Pearl Harbor FCU

cc: CCUL