



March 30, 2026

Ms. Melane Conyers-Ausbrooks
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

RE: Requirements for Insurance
(Docket No. NCUA-2026-0136; RIN 3133-AG00)

Dear Ms. Conyers-Ausbrooks:

On behalf of its member credit unions, the Cooperative Credit Union Association, Inc. ("Association") appreciates the opportunity to comment on the National Credit Union Administration (NCUA) Board's proposed rule on Requirements for Insurance for state-chartered federally-insured credit unions (FISCUs) in relation to nonmember account that do not qualify for NCUA share insurance. This proposed rule is one of four proposals issued as "Round Four" of the NCUA Deregulation Project. The Association is the state trade association representing nearly 200 state and federally-chartered credit unions located in the states of Delaware, Massachusetts, New Hampshire, and Rhode Island, which further serve over 5 million consumer members. The Association developed these comments in consultation with our members.

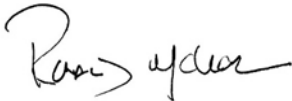
The Association supports the Board's proposal to delete Section 741.10 of NCUA regulations and urges the Board to finalize this amendment as proposed. Section 741.10 requires FISCUs to provide disclosures to nonmember depositors whose accounts don't qualify for NCUA share insurance because the FISCU isn't a low-income designed credit union (LICU) and the funds in question are not Public Unit deposits. As the Board noted in its proposal, Section 741.10 is unnecessary and redundant because FISCUs are independently required to provide these account holders with such disclosures through their Agreement for Insurance of Accounts with NCUA and NCUA Form 9600, "Information to be Provided in Support of the Application of a State Chartered Credit Union for Insurance of Accounts."

The Association represents credit unions in four states, three of which have state credit union acts. These state credit union laws generally limit our FISCUs members to holding member shares and deposits, and other shares or deposits that would typically qualify as NCUA-insurable insurable accounts. We also note that Massachusetts state-chartered credit unions must have insurance coverage from the Massachusetts Credit Union Share Insurance Corporation (MSIC) with respect to shares or deposit in excess of the amount insured by NCUA. *See* M.G.L. Ch. 171, § 30 ("[N]o such credit union shall accept deposits or payments for shares for the account of a shareholder or depositor in excess of the amount which is insured by the National Credit Union Administration unless the excess is insured by the

Massachusetts Credit Union Share Insurance Corporation pursuant to section 6D of chapter 294 of the acts of 1961.”).

Thank you for the opportunity to comment on the NCUA Board’s proposed rule on Requirements for Insurance. If you have any questions or desire further information, please do not hesitate to contact the Association at (508) 481-6755 or govaff-reg@ccua.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald McLean". The signature is fluid and cursive, with a large initial "R" and a long horizontal stroke extending to the right.

Ronald McLean
President/CEO
Cooperative Credit Union Association, Inc.
rmclean@ccua.org