



February 9, 2026

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

RE: Corporate Credit Unions (Docket No. NCUA-2025-1302; RIN 3133-AF73)

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 Corporate Credit Unions, which is part of NCUA's Deregulation Project. The Association is the state trade association representing approximately 170 state and federally-chartered credit unions located in the states of Delaware, Massachusetts, New Hampshire, and Rhode Island, which further serve over 4.4 million consumer members. The Association developed these comments in consultation with our members.

This proposed rule is one of four proposals issued as "Round One" of the NCUA Deregulation Project which the Association is commenting on. As proposed, NCUA would remove the requirement in Section 704.8 that the Asset and Liability Management Committee (ALCO) include a member of the board of directors. In addition, the proposal would amend Section 704.15 so that corporate credit unions no longer be required to file their annual reports and management letters with the NCUA.

The Association supports this proposal and urges the Board to finalize it as proposed, which should reduce compliance burdens on federally-insured credit unions (FICUs). In addition, the Association supports the NCUA Deregulation Project's shift away from overly prescriptive rules and towards a more flexible, principles-based credit union regulatory framework.

We agree that the amendment to Section 704.8 would be less prescriptive than the status quo and would provide corporate credit unions with greater flexibility to structure their asset and liability governance based composed of individuals with technical expertise in balance sheet management. This will reduce unnecessary regulatory burdens while maintaining safe and sound asset and liability management given that the substantive regulatory requirements in relation to those areas of corporate credit union operations will remain unchanged.

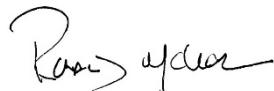
We urge the Board to finalize the changes to Section 704.8 as proposed.

Regarding the proposed amendments to Section 704.15, we agree with the Board that requiring corporate credit unions to submit their annual reports and management letters to NCUA is an unnecessary paperwork burden because NCUA has access to all of the books and records of a corporate credit union as part of the examination and supervisory process. We urge the Board to finalize this aspect of the rule as proposed.

We urge the Board, however, also to amend Section 704.15 so that corporate credit unions have at least 30 days to inform NCUA that an independent accountant has been dismissed or has resigned, instead of the current 15 days. Notice within 30 days would reduce paperwork burden on corporate credit unions while still providing NCUA sufficient time to take corrective action in the rare event that the dismissal or resignation was in fact related to a disagreement on a professional matter that materially implicated the corporate credit union's safety and soundness.

Thank you for the opportunity to comment on the NCUA Board's proposed rule on Corporate Credit Unions. 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](mailto:govaff-reg@ccua.org).

Sincerely,



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