



March 30, 2026

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

RE: Notice of Termination of Excess Insurance Coverage
(Docket No. NCUA-2026-0135; RIN 3133-AF97)

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 Notice of Termination of Excess Insurance Coverage. 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.

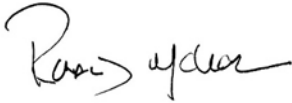
The Association supports the Board's proposal to amend Section 741.5 to no longer mandate specific timing for when a federally insured credit union (FICU) notifies its members that it is terminating its excess share insurance. Excess share insurance can be provided by a private insurance company like American Share Insurance (ASI) or a state instrumentality like the Massachusetts Credit Union Share Insurance Corporation (MSIC) to supplement federal NCUA share insurance by insuring amounts above the federal \$250,000 limit.

Currently, Section 741.5 requires the FICU to notify its members that it is terminating excess share insurance at least 30 days prior to the termination even if state law mandates a different notice period. If this rule is finalized as proposed, a FICU would still be required to notify its members that it plans to terminate excess share insurance coverage but would have more discretion with respect to the timing of that notice.

Federally-insured credit unions in Delaware, Massachusetts, New Hampshire, and Rhode Island can have excess share insurance from ASI, an Ohio insurance company. In addition, Massachusetts state-chartered credit unions must have insurance coverage from MSIC with respect to shares or deposits in excess of the NCUA-insured amount, *see* M.G.L. Ch. 171, § 30, and MSIC can also provide excess share insurance to federal credit unions in Massachusetts. *See, e.g.,* "An Act Relative to the Massachusetts Share Insurance Corporation," 1996 Mass. Acts 220, Ch. 115, § 4.

We urge the Board to finalize this rule as proposed because it will help reduce compliance burdens on credit unions that terminate their excess shares insurance coverage while still providing their members with the same notices in substance. Thank you for the opportunity to comment on the NCUA Board's proposed rule on Notice of Termination of Excess Insurance Coverage. 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 at the end.

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