



April 13, 2026

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

RE: Chartering and Field of Membership for Federal Credit Unions—
Interpretive Ruling and Policy Statement 06-1 (IRPS 06-1)
(Docket No. NCUA-2026-0265-0001; RIN 3133-AF78)

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 to rescind Interpretive Ruling and Policy Statement 06-1 (IRPS 06-1) on underserved areas served by federal credit unions. This proposed rule is one of three proposals issued as “Round Five” of the NCUA Deregulation Project. The Association is the state trade association representing nearly 160 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 rescind IRPS 06-1 and urges the Board to finalize it as proposed. As the Board noted in its proposal, the current requirements for service to underserved areas are stated in Chapter 3 of the NCUA Chartering and Field of Membership Manual that is codified in Appendix B to Part 701 of NCUA Rules and Regulation. This proposed rescission of IRPS 06-1 therefore would not add, remove, clarify, or otherwise change the substantive requirements already established Appendix B to Part 701 because IRPS 06-1 is redundant with the Chartering Manual regulation.

In addition, since IRPS are treated as one-off regulations that are not usually codified, their use as an administrative procedure creates regulatory burdens by requiring credit unions to consult the NCUA’s list of IRPS on its website as well as the Code of Federal Regulations and the Federal Credit Union Act to make sure that they are in compliance with all NCUA requirements.

Originally, the agency’s use of IRPS was premised on a statutory exemption in the Administrative Procedure Act from notice and comment rulemaking requirements, but the Board’s practice for decades has been to issue IRPS for public notice and comment anyway because IRPS typically include requirements that are binding on the public which courts have held require notice and comment procedures. *See* 5

U.S.C. § 553(b)(4)(A); *Credit Union Nat'l Assoc. v. NCUA Board*, 573 F. Supp. 586, 592 (D.D.C. 1983). Simply from an ease-of-use standpoint, it would be better policy for the agency to publish all its regulations in the Code of Federal Regulations instead of having two sets of sources.

Thank you for the opportunity to comment on the NCUA Board's proposed rule to rescind IPRS 06-1 and thereby streamline the federal credit union underserved area field of membership expansion process. 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