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April 24, 2015

Mr. Gerald Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314-3428

RE: Comments on Proposal for Fixed Assets; RIN 3133-AE39

Dear Mr. Poliquin,

The Georgia Credit Union League (GCUL) appreciates the opportunity to comment on the Proposal for Fixed Assets. As a matter of background, GCUL is the state trade association and one member of the network of state leagues that make up the Credit Union National Association (CUNA). GCUL serves approximately 136 Georgia credit unions that have over 2 million members. This letter reflects the views of our Regulatory Response Committee, which has been appointed by the GCUL Board to provide input into proposed regulations such as this.

GCUL appreciates that NCUA has revisited the fixed asset rule and made what we feel are significant improvements from the 2014 proposal. We are very supportive of the elimination of the 5% aggregate limit on investments in fixed assets. In NCUA's 2014 proposal, while GCUL supported eliminating the 5% cap, we believed that the fixed asset management (FAM) program would place additional burdens on FCUs that they currently did not face. We are pleased to see that NCUA listened to our credit unions and eliminated the FAM from the 2015 proposal.

If the Board finalizes this 2015 proposal, NCUA will issue updated supervisory guidance to examiners that will be shared with FCUs. We feel the guidance could be consequential in regards to how the requirements in the proposal are applied. We urge NCUA to provide this guidance in a timely manner and allow comments on the guidance as well, due to its importance in implementing the rule.

GCUL is supportive of the change in the proposal that establishes a single six-year time period for partial occupancy of such premises and would discontinue the 30-month requirement for partial occupancy waiver requests. We believe that for NCUA to achieve true regulatory relief in the fixed assets rule, that the partial

occupancy requirement in the fixed asset rule should be eliminated. As previously stated, we would like to see total elimination of the partial occupancy requirement; however, if NCUA finds that it cannot eliminate the partial occupancy requirement, we support NCUA having the ability to grant a waiver of the partial occupation requirements whenever the credit union so requests the waiver.

While we greatly appreciate that NCUA is trying to reduce the burdens associated with this rule for FCUs, we believe that this should not be a one-size fits all rule and the examiners should not be trained in that manner. Instead, fixed asset acquisitions should be evaluated within the individual strategies of each credit union. Credit unions can then demonstrate that they are intelligent and thoughtful about how credit union capital is spent/allocated.

GCUL appreciates the opportunity to present comments on behalf of Georgia's credit unions. Thank you for your consideration. If you have questions about our comments, please contact Selina Gambrell or Cindy Connelly at (770) 476-9625.

Respectfully submitted,

A handwritten signature in cursive script that reads "Selina M. Gambrell". The signature is written in dark ink and is positioned below the typed name.

Selina M. Gambrell  
Compliance Specialist