



Filed via [regcomments@ncua.gov](mailto:regcomments@ncua.gov)

July 13, 2015

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

**Re: Comments on Proposed Rule – Part 745, RIN 3133–AE49**

Dear Mr. Poliquin:

InTouch Credit Union (ITCU) is an \$800 million institution headquartered in Plano, Texas, operates twenty-one branches and two call centers in five states, and serves over 85,000 members residing in all 50 states and 32 foreign countries. On behalf of the Board, staff, and members of ITCU, I appreciate the opportunity to comment on the National Credit Union Administration's (NCUA) proposed share insurance rule.

If I understand the proposed rule correctly, the changes would help ensure account insurance coverage parity between the Federal Deposit Insurance Corporation (FDIC) and NCUA via the Credit Union Share Insurance Fund Parity Act (i.e., H.R. 3468). I am grateful the NCUA chose to listen to the US Congress and others in the credit union movement to ensure equal treatment of interest on lawyer trust accounts (IOLTA) as well as other escrow-type accounts. These accounts not only serve a vital purpose but frequently require a licensed professional to serve in a fiduciary capacity holding funds for the benefit of clients. For far too long, credit unions have not been able to effectively compete with FDIC banks for these types of member or potential member assets. Further, it seems clear that Congress intended complete insurance parity with the language added to the Federal Credit Union Act in 2006. As a result, the adoption of this proposed rule will eliminate the banking disadvantage experienced by credit unions, members, and potential members throughout the country. ITCU supports the proposal.

In closing, thank you for the opportunity to comment on the proposed regulation. Please feel free to contact us if you would like any additional information.

Sincerely,

A handwritten signature in black ink that reads "Kent L. Lugrand".

Kent L. Lugrand  
President & CEO  
InTouch Credit Union  
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