



June 27, 2016

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

Re: Comments on Notice of Proposed Rulemaking for Parts 701 and 721, FCU
Occupancy, Planning, and Disposal of Acquired and Abandoned Premises; Incidental
Powers – RIN 3133–AE54

Dear Mr. Poliquin:

This letter represents the views of the Cornerstone Credit Union League ["Cornerstone"] in response to the National Credit Union Administration's ["NCUA"] proposal regarding occupancy rules. Cornerstone is the official trade association serving 532 federal and state credit unions in Arkansas, Oklahoma, and Texas combined, and more than 8.9 million credit union members. Cornerstone appreciates the opportunity to comment on this very important issue.

We appreciate NCUA's efforts to improve occupancy and planning rules. The proposed rule will allow our credit unions to pursue growth opportunities without the pressure of meeting full occupancy requirements within such a short period of time. The ability to partially occupy property for an extended period allows our credit unions to better manage expansion plans, especially when there is difficulty realizing future growth potential or member service strategies.

We fully support this proposed rule, and encourage NCUA to revise other rules for similar flexibility.

Thank you very much for considering our comments. If you have any questions, please do not hesitate to contact me at (512) 853-8516.

Sincerely,

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