

November 20, 2017

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

Dear Mr. Poliquin:

Re: Comments on NCUA Regulatory Reform Agenda.

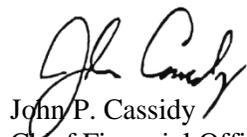
Alaska USA Federal Credit Union (Alaska USA) appreciates the opportunity to comment on the National Credit Union Administration (NCUA) Regulatory Reform Agenda. Alaska USA is a federally chartered credit union with \$7.2 billion in assets, serving over 635,000 members primarily in Alaska, Washington, Arizona and California.

Alaska USA applauds the NCUA's efforts in undertaking its regulatory reform project, and is in general agreement with the recommendations and proposed timeline of the Regulatory Reform Agenda. In particular, Alaska USA supports raising the threshold for required stress testing to an amount greater than \$10 billion, and assigning responsibility for conducting stress testing to the credit unions. Alaska USA looks forward to commenting on the recently proposed amendment to the capital planning and stress testing regulation.

Alaska USA also supports delaying the January 1, 2019, Risk Based Capital implementation date until the NCUA has addressed the Risk Based Capital amendments that are also included in the Regulatory Reform Agenda (i.e., Number 7 of the Tier 2 Recommendations). The delay in the Risk Based Capital implementation date should be made as soon as possible so that credit unions are not preparing to comply with a regulation that will be amended. Alaska USA supports amending the Risk Based Capital rule, and looks forward to the opportunity to comment on the amendments when they are proposed.

Thank you for the opportunity to comment on the NCUA Regulatory Reform Agenda. If you have any questions, please feel free to contact me at j.cassidy@alaskausa.org or (907) 786-2501.

Sincerely,



John P. Cassidy
Chief Financial Officer