



September 25, 2013

Ms. Mary Rupp  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314-3428

Email: [regcomments@ncua.gov](mailto:regcomments@ncua.gov)

Re: Comments on Proposed Interpretive Ruling and Policy Statement 13-1,  
Minority Depository Institution Preservation Program; RIN 3133-AE16

Dear Ms. Rupp:

On behalf of the African-American Credit Union Coalition (AACUC), we welcome and appreciate the opportunity to submit comments on the proposed interpretive ruling and policy statement (IRPS) regarding the creation of a NCUA minority depository institution preservation program to encourage the preservation of Minority Depository Institutions (MDI's). The AACUC is the premier African-American credit union organization whose mission is to increase the strength of the credit union movement through mentorship, internship, and leadership. To that end, the AACUC unequivocally supports the NCUA's proposed IRPS that is in alignment with our organization's core values and strategic goals.

Section 367 of the Dodd Frank Act established the regulatory basis for the NCUA's MDI program and the agency's adoption of the articulated goals of the Financial Institutions Reform, Recovery and Enforcement Act (FIRREA) to preserve, promote, and encourage the creation of minority credit union ownership. The NCUA Office of Minority and Women Inclusion (OMWI) established by Section 342 of Dodd Frank and charged with the task of developing standards for minority and women participation in: 1) the NCUA's workforce, 2) entities that transact business with the agency, and 3) the entities regulated by the agency, will administer the MDI program. Both sections 342 and 367 are complementary and in tandem will ultimately result in the strengthening of the credit union movement on a microeconomic and macroeconomic level, respectively.

The AACUC recognizes and commends the NCUA for the listing of MDI's in regional order that appears on the agency's website. According to the IRPS, the NCUA "envisions a program of proactive steps and outreach efforts;" the AACUC is hopeful

that it will be fully funded to achieve the goals of FIRREA. Moreover, the program's outreach efforts can include: application process webinars for potential MDI's, workshop sessions at trade conferences, and a comprehensive marketing campaign to increase awareness. The AACUC encourages the NCUA OMWI to collaborate, if it hasn't already, with the original FIRREA regulatory counterparts (e.g., FDIC, OTS, etc.) for suggestions and ideas that have been successfully implemented.

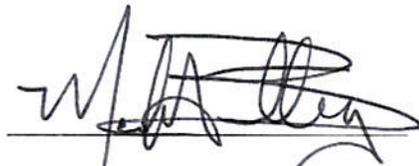
Finally, we are encouraged by NCUA's willingness to form "collaborating partnerships" with organizations. The AACUC stands ready, willing, and able to be a resource partner. Currently, on a case-by-case basis, the AACUC provides mentorship to credit unions that are in need of technical assistance or asset/liability management expertise. We are also in the process of expanding our biographical database of credit union experts who are well versed in the areas of compliance, board governance, and strategic planning to name a few.

The AACUC appreciates this opportunity to comment on this important IRPS and acknowledges the NCUA's positive steps toward fulfilling the goals of Dodd Frank and FIRREA.

Very truly yours,



Lynette Smith  
Chair



Mark S. Brantley, Esq.  
Vice-Chair and Advocacy Chair