



*Contra Costa*  

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*Federal Credit Union*

May 23, 2014

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

**Re: Comments of Federal Credit Union Ownership of Fixed Assets Proposed Rule**

Dear Mr. Poliquin:

On behalf of our Credit Union which serves 27,000 members primarily in California, I appreciate the opportunity to comment on NCUA's proposed Federal Credit Union (FCU) ownership of fixed asset rule, which would make major revisions to the structure of corporate credit unions.

We thank NCUA for proposing regulations that will help improve and strengthen the natural-person credit union system. Our comments on selected portions of the regulation are as follows:

We support NCUA's proposal to amend its regulation by removing the waiver requirement for FCUs to exceed the 5% aggregate limit on investment in fixed assets. We feel most FCUs have the Asset-Liability Management (ALM) models in place commensurate with their size and complexity to ensure the propriety of any increase in fixed assets.

We further support the proposal to require the implementation of a fixed assets management (FAM) program for those FCUs opting to exceed the 5% limit. We feel the FAM program can easily be included in the ALM Policy approved by the Board of Directors annually.

We support the five-year timeframe for simplifying the rule regarding partial occupancy of premises acquired for future expansion and the elimination of the 30-month timeframe for credit unions to submit its waiver request to partially occupy premises for future expansion.

It is our understanding NCUA will provide guidance at a later date. This guidance is critical and can make a significant difference in how the requirements in the proposal are applied. We urge NCUA to provide guidance in a timely manner and allow comments on the guidance as well as on this proposed rule and future rules.

We appreciate the opportunity to respond to your proposed regulation. Thank you for your consideration of our views.



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Sincerely,

A handwritten signature in black ink, appearing to read "David M. Green". The signature is fluid and cursive, with the first name being the most prominent.

**David M. Green**  
President/CEO