



June 4, 2015

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

RE: Comments on Corporate Credit Unions Rule, RIN 3133-AE52

Dear Mr. Poliquin,

Mid-Atlantic Corporate Federal Credit Union (Mid-Atlantic Corporate) appreciates the opportunity to comment on the National Credit Union Administration's (NCUA's) proposed corporate credit unions rule 12 CFR Part 704, which excludes Central Liquidity Facility (CLF)-related bridge loans from the aggregate unsecured lending cap to one borrower applicable to a corporate credit union (corporate). Specifically, a CLF-related bridge loan that is exempt from that cap is a bridge loan made by a corporate to a natural person credit union (credit union) when the credit union has been approved for a loan by the CLF and is awaiting funding from the CLF. Additionally, the proposal excludes CLF-related bridge loans from the calculation of "net assets" and "net risk weighted assets" for determining minimum capital requirements.

Mid-Atlantic Corporate is a corporate that serves credit unions throughout the United States. The comments contained in this letter reflect the input from Mid-Atlantic Corporate senior management.

The proposed rule is critical for corporates to support the CLF and its ability to provide needed funding for credit unions. Without corporates, or a syndicate of corporates, providing a bridge loan while awaiting CLF approval and disbursement of funds, a credit union could experience a potentially disastrous gap in funding. Mid-Atlantic Corporate is in agreement with the proposed rule as it is written.

Sincerely,

A handwritten signature in black ink that reads "Jay R. Murray". The signature is written in a cursive, flowing style.

Jay R. Murray
President/CEO

CC: Lori A. Gall, SVP, Administration
Rodney A. May, SVP, Member Services
Jeffrey M. Stoner, SVP/CFO
Tim Sustak, SVP, Treasury & Investments