

CORPORATE CREDIT UNION
Alliance

June 10, 2015

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

Re: Proposed Amendments to 12 CFR Part 704

Dear Mr. Poliquin:

The Corporate Credit Union Alliance (CCUA) appreciates the opportunity to provide comments to the NCUA Board regarding proposed changes to the Corporate Rule Part 704 of the NCUA Rules and Regulations sections §704.2 Definitions and §704.7 Lending.

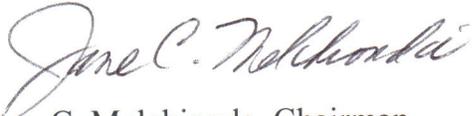
The CCUA was formed by corporate credit unions primarily for the purpose of advocating for the well-being of corporate credit unions across various constituencies, including regulators and lawmakers, and fostering cooperation among corporate credit unions. All 13 corporate credit unions are presently members of the CCUA.

The CCUA has been working diligently with the Central Liquidity Facility (CLF) during the past two years toward a goal of supporting the CLF in its efforts to provide emergency liquidity to natural person credit unions. The focus of these efforts has been to establish a means by which corporates are able to provide correspondent services to the CLF. These efforts have resulted in a CLF Correspondent Agreement, which all corporates have agreed upon and executed.

The proposal addresses changes to sections §704.2 and §704.7 that are necessary for corporates to fulfill this role. The CCUA supports all of the proposed changes to both of these sections.

Thank you once again for this opportunity to comment on the proposed changes to the Corporate Regulation.

Sincerely,



Jane C. Melchionda, Chairman

On behalf of the Executive Committee of the Corporate Credit Union Alliance

Robert Fouch	Corporate Central Credit Union
Jay Murray	Mid-Atlantic Corporate Federal Credit Union
David Brehmer	First Carolina Corporate Credit Union

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