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Public Comments on Alternative Capital: =====

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Comment: I applaud the NCUA for being forward thinking on allowing credit unions to utilize supplemental capital for Risk-Based Capital purposes. Supplemental capital could be used effectively by credit unions to enhance their safety and soundness, recover more quickly from economic setbacks, and allow them to grow or tap new markets that might otherwise be out of their reach. If structured properly, this tool would have no effect on the member-owned cooperative nature of the credit union which is the underpinning of the tax exemption. We urge the NCUA to move forward with this important rule.

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