

From: [Steve Pociask \(ACI\)](#)
To: [Regulatory Comments](#)
Subject: Comments on Advanced Notice of Proposed Rulemaking for Supplemental Capital
Date: Monday, May 08, 2017 9:59:31 AM



May 8, 2017
Gerald Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA. 22314

Re: Comments on the “Advance Notice of Proposed Rulemaking for Supplemental Capital”

Mr. Poliquin:

The American Consumer Institute Center for Citizen Research (ACI) appreciates the opportunity to provide the National Credit Union Administration (NCUA) our thoughts regarding the “Advance Notice of Proposed Rulemaking for Supplemental Capital.” ACI is a nonprofit (501c3) educational and research institute with the mission to identify, analyze and project the interests of consumers in select legislative and rulemaking proceedings in information technology, health care, finance, energy and other matters.

NCUA is soliciting comments on alternative forms of capital that credit unions can use in meeting statutorily and regulatorily required capital standards. In our view, we support providing credit unions access to additional sources of capital from both members and nonmembers, so long as it does not substantially affect the cooperative nature, ownership and structure of credit unions. The NCUA can accomplish the expansion and access to this alternative capital, while providing appropriate consumer protections, as well as necessary disclosure requirements. In our view, increasing access to alternative capital will enhance the safety and soundness of credit unions and, in doing so, should not impact credit unions’ tax status.

In closing, ACI believes that this Advanced Notice of Proposed Rulemaking is consistent with furthering the public’s interests. With this in mind, we support this effort and ask the NCUA to move ahead to the next phase of rulemaking.

Respectfully,

Steve Pociask

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