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Public Comments on Alternative Capital: =====

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1775 Duke Street
Alexandria, VA 22314-3428

RIN:
Docket ID: NCUA-2017-0007
FR #: 2017-01713

Subject: Comments on Advance Notice of Proposed Rulemaking for Supplemental Capital
Dear Mr. Poliquin:

Thank you for the opportunity to provide comments on the National Credit Union Administration (NCUA) proposal for alternative capital for credit unions. Credit unions already have access to an alternative means of capital formation--it's called income tax exemption. This roughly 35-40% advantage credit unions have over tax-paying commercial bank competitors should be more than sufficient to support credit unions' statutorily governed common bond growth.

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