

May 8, 2017

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

Re: Cornerstone Comments on Advance Notice of Proposed Rulemaking for Supplemental Capital

Sent via email to: regcomments@ncua.gov

Dear Mr. Poliquin:

This letter represents the views of the Cornerstone Credit Union League ["Cornerstone"] in response to the National Credit Union Administration's ["NCUA"] advance notice of proposed rulemaking on supplemental capital. Cornerstone is the official trade association serving 520 federal and state credit unions in Arkansas, Oklahoma, and Texas combined, and more than 8.1 million credit union members. Cornerstone appreciates the opportunity to comment on this very important issue.

Thank you for exploring options to provide additional flexibility to credit unions. We are aware that several other credit union trade associations are submitting comment letters in support of allowing supplemental capital to contribute toward a portion of a credit union's risk-based capital ratio. However, feedback received from credit unions in our region indicates that supplemental capital is not a priority. The consensus is that very few credit unions in our area would use supplemental capital as proposed.

For credit unions in our region, priorities include easing regulatory burdens and maintaining the credit union tax exemption. We encourage NCUA to continue to work towards eliminating unnecessary compliance burdens so that credit union time and resources can be directed at better serving their members.

Thank you for considering our comments. Please feel free to contact me with any question you may have.

Sincerely,



Caroline L. Willard
President & CEO
Cornerstone Credit Union League
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