

**From:** [Sandra Yocum](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Comments Proposed Amendments 12 CFR Part 704  
**Date:** Wednesday, July 12, 2017 10:07:20 AM

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July 12, 2017

Gerald Poliquin, Board Secretary  
National Credit Union Administration  
Email: [regcomments@ncua.gov](mailto:regcomments@ncua.gov)

RE: Proposed Amendments to 12CFR Part 704 – Corporate Credit Unions

As a West Virginia credit Union CEO and a board member of Volunteer Corporate Credit Union, I would like to thank the NCUA board for considering the changes to 12CFR Part 704.

I feel that the changes would improve Reg 704 in multiple ways:

- lessen the uncertainty when comparing my Corporate's capital with other institutions
- strengthen all corporates as we strive to reach the 2.5% retained earnings ratio
- allow us to count 100% of PCC contributions
- clarify PCC and equity acquired are both available to cover losses
- bring the Reg into alignment with GAAP

I believe that these changes are very necessary and make more sense than the current regulations. They would add strength and clarity to all corporates' capital adequacy. Volunteer Corporate is currently well-capitalized and we're on our way to reaching the goal of 2.5% retained earnings. As a PCC owner, this added strength and transparency to our capital position is welcomed.

Regards,

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