



August 4, 2017

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

Re: Comments on Appeals Procedures, RIN 3133-AE68

Dear Mr. Poliquin:

Thank you for the opportunity to provide comments on the proposed rule to adopt more uniform procedures to govern the appeals process including appeals to the NCUA Board. State Employees' Credit Union of Raleigh, North Carolina is the nation's second largest credit union with more than \$36 billion in assets and 2.2 million members who are provided services through 258 branches, nearly 1,100 ATMs, 24/7 services via phone and an interactive website, [www.ncsecu.org](http://www.ncsecu.org). We support the proposed adjustments to the appeals procedures which will provide a clearer and improved roadmap for the fair consideration of appeals for credit unions and the NCUA.

We offer three items for consideration as you deliberate the appeals procedures process:

- We recommend additional consideration be given to enhancing and defining the role of the NCUA Ombudsman within the appeals process. There was no mention of the role of the Ombudsman in the recommendations to enhance the appeals procedures. What role will he or she play? The Ombudsman can play an important and substantive role in the appeals process but greater independence of the Ombudsman position would be critical in demonstrating in both appearance and fact a fair and balanced appeals process.
- We recommend that consideration be given to specifically identify that the regulatory Capital Planning regime be included in the appeals process up to the NCUA Board level.
- We recommend that consideration be given to specifically identify that the Supervisory Stress Tests be included in the appeals procedures up to the NCUA Board level.

We appreciate the efforts made to streamline and improve the appeals procedures. We appreciate your consideration of our recommendations as you move forward in the rulemaking process.

Thank you for the opportunity to provide comments on your recommended improvements to the appeals procedures for credit unions.

Sincerely,

A handwritten signature in black ink that reads "Michael J. Lord". The signature is written in a cursive style with a large, prominent initial "M".

Michael J. Lord  
President