

August 7, 2017

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

Re: Comments on Voluntary Mergers of Federally Insured Credit Unions

Dear Mr. Poliquin,

NuVision Federal Credit Union (NuVision) appreciates the opportunity to comment on the National Credit Union's (NCUA) proposed rulemaking related to voluntary mergers of federally insured credit unions. NuVision serves over 81,000 members and we are headquartered in Huntington Beach, California.

NuVision has participated in voluntary mergers and we have found the current process works relatively well. We believe the Boards of merging credit unions are capable of representing the interests of their memberships and providing oversight to ensure that any potential conflicts of interests are appropriately addressed. Furthermore, our experience with NCUA Regional Offices is that they evaluate merger applications prudently and professionally. While this rule appears well intended, it seems that the rule is striving to address rare exceptions that can be adequately addressed within the existing regulatory framework. We believe that this proposed rule is unnecessary and we suggest that it be withdrawn. In our view, there is an urgent need for less regulation so credit unions can focus on serving consumers and small businesses in alignment with the current Administrations' goals.

Thank you again for the opportunity to provide our feedback. Please contact me at [rballard@nuvisionfederal.org](mailto:rballard@nuvisionfederal.org) or 714-375-8001 with any questions.

Sincerely,

A handwritten signature in black ink that reads "Roger Ballard".

Roger Ballard  
Chief Executive Officer