

August 2, 2017

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

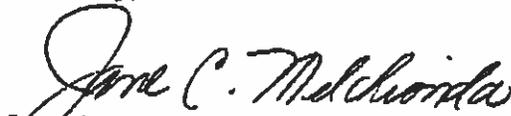
Dear Mr. Poliquin:

Thank you for the opportunity to comment on the proposed rule changes to 12CFR 704 for Corporate Credit Unions as published in the Federal Register on July 3, 2017. For your information, EasCorp is federally-chartered corporate credit union headquartered in Burlington, Massachusetts. EasCorp has 229 member credit unions throughout the United States with cumulative assets exceeding \$114 billion.

We support the proposed changes to 704.2 including the newly added definition of retained earnings, as well as the proposed changes to calculations of retained earnings and tier 1 capital. In our opinion, the proposed rule quite properly maintains incentives for building retained earnings within corporate credit unions, while recognizing members' full value of their permanent capital investment in corporate credit unions.

We also appreciate the NCUA Board's acknowledgement of the efforts and gains made by the corporate credit union community since the current corporate credit union rule was introduced in 2010, including the rebuilding of retained earnings, restructuring of balance sheets and acquisition of substantial member/owner support.

Sincerely,

  
Jane C. Melchionda  
President/CEO