



August 21, 2017

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

Re: Request for Public Comment Regarding Corporate Credit Unions  
RIN 3133-AE75

Dear Mr. Poliquin,

Thank you for allowing me the opportunity to share my comments concerning the National Credit Union Administration's (NCUA) proposed changes to corporate credit unions. KEMBA Financial Credit Union, which serves 93,000 members and has assets approaching \$1.2 billion, is a proud member of Corporate One Federal Credit Union and believe we can provide first hand testimony to the value that corporate credit unions provide our credit union.

We vehemently support the proposed changes regarding the modifications surrounding the definitions of retained earnings and Tier 1 capital. We appreciate NCUA's initiative to establish a regulatory framework that provides a foundation for a safe, sound, and vibrant corporate system.

NCUA has noted that the economy, marketplace conditions, industry, and corporates themselves have changed dramatically and positively in the years following the Great Recession. While the NCUA's Corporate Stabilization Program served a positive purpose, it is time to end that chapter and move forward.

We strongly support the rule changes proposed by NCUA. Specifically, we agree that:

- The definition of "retained earnings" should expressly include equity acquired in a merger;
- The change to Tier 1 capital, as a result of the new retained earnings definition, will benefit the corporate system and its members, including KEMBA Financial Credit Union; and,
- NCUA should place Part 704 of the rules on their 2018 rule review schedule; rule modernization, in our opinion, is usually overdue and typically has a positive outcome.

As a member of Corporate One FCU, we applaud your agency's proposal to implement common-sense regulations that benefit corporate credit unions and their members. We politely request that NCUA adopt the proposed rule.

Respectfully,

  
Gerald D. Guy  
President/CEO