



August 29, 2017

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

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

Dear Mr. Poliquin,

Thank you for the opportunity to comment on the National Credit Union Administration's proposal to close the Temporary Corporate Credit Union Stabilization Fund (TCCUSF) and raise the National Credit Union Share Insurance Fund (NCUSIF) normal operating level to 1.39%.

This letter is written on behalf of the Board of Directors, management team and members of Day Air Credit Union, Inc. Day Air is a state chartered, federally insured credit union with \$375 million in assets serving 42,000 members in the Dayton, Ohio area.

We strongly support the proposed changes to 704 regarding the definitions of retained earnings and Tier 1 capital. The definition of retained earnings should include equity acquired in mergers, which would align with generally accepted accounting principles (GAAP). Perpetual contributed capital (PCC) should be included in Tier 1 capital, subject to a minimum 2.5% retained earnings ratio. The change in these definitions will benefit the corporate system and its members, including Day Air Credit Union.

Thank you for the opportunity to comment.

Sincerely,

William J. Burke
President/CEO

