La Capitol
FEDERAL CREDIT UNION

August 15, 2017

Mr. Gerald Poliquin, Secretary of the Board
National Credit Union Administration
Via email: regcomments@ncua.gov

RE: Comments on Proposed Rule – 12 CFR Rule 704 – Corporate Credit Unions

On behalf of La Capitol Federal Credit Union, I am writing to you regard the NCUA Board proposal to change 12 CFR Part 704. We support the proposed changes which will enhance the transparency and the reporting of a corporate credit union's capital adequacy.

La Capitol agrees with the proposed change to incorporate GAAP equity acquired in a merger as component of retained earnings and be included in the definition of Tier 1 capital. This treatment will be consistent with the definitions used by other financial institutions and regulators.

We also agree with the proposal to allow corporate credit unions to include all Perpetual Contributed Capital (PCC) in the capital definitions and rations once a retained earnings ratio of 250 basis points is achieved. The permanency of PCC should all it to be counted at 100 percent of tier 1 capital

Thank you for the opportunity to comment on the proposed changes to 12 CRF Part 704 – Corporate Credit Unions. If I can be a source of any further information on this comment letter, please do not hesitate to contact me at mhooper@lacapfcu.org or by phone at (225) 342-5055.

Sincerely,

Michael Hooper
President/CEO

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