

September 20, 2017

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

RE: Comments on Proposed Rule 701, In Danger of Insolvency Definition

Dear Mr. Gerald Poliquin,

I am writing on behalf of CalCom Federal Credit Union, \$64-million in asset credit union serving 9,400 members of multiple common bonds within the Los Angeles County area. We appreciate the opportunity to provide comments to the National Credit Union Administration on its proposed changes to Part 701 and the definition of "in danger of insolvency".

We agree with the proposed change of extending the forecast horizon for two of the three categories by an additional six months. We do agree that this change will help protect the National Credit Union Share Insurance Fund and improve merger prospects.

We agree with the addition of a fourth category of credit unions receiving section 208 assistance largely based on the statistical data that 92% stopped filing call reports within 15 months. We would caution however that doing so may deter credit unions from seeking section 208 assistance. Further, we believe the approach should be understanding what the other 8% did differently and find ways to apply that to all credit unions applying for section 208 assistance.

We thank you for allowing us the opportunity to express our comment on this proposed rule and for considering our views.

Sincerely,

Jon Hernandez
CEO
CalCom FCU

cc: CCUL