



August 30, 2017

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

RE: Comments Proposed Rule - Requirements for Insurance; National Credit Union Share Insurance Fund Equity Distributions

Dear Mr. Poliquin:

On behalf of ABNB Federal Credit Union, I would like to offer the following comments on the NCUA's proposal to amend the share insurance requirements regarding distributions from the NCUSIF and Equity distributions resulting from the Corporate System Resolution Program. I appreciate the opportunity to be heard and have ABNB's concerns considered as NCUA moves forward on this important proposal that will return sorely needed capital to credit unions allowing us to implement needed technology, ease the continuing cost of compliance and put this capital back to work for our member-owners.

ABNB does not support the following areas of the proposal:

- Increasing the NOL from 1.30% to 1.39%, it should remain unchanged.
- The lack any provision for unwinding the NOL after 2021.

ABNB supports the following areas of the proposal:

- Using the LIFO method of equity distributions.
- Calculating a FICU's share for the NCUSIF equity distribution using the four quarter end average of insured share balances.

A full refund to credit unions now is the preferred solution. This would put us in a better position to weather whatever the future has in store for ABNB or the movement including the unlikely worst case forecast of the agency.

Thank you for the opportunity to comment on this proposal which ABNB feels is very important to our credit union and the movement. Please do not hesitate to contact me if I can provide additional information or perspective on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Christopher E. Anuswith", is written over a white background.

Christopher E. Anuswith, CCUE, CUERME, NCCO, NCRM
Vice President – Risk Management