



September 5, 2017

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

RIN: 3133-AE77

Dear Mr. Poliquin,

On behalf of the Hudson River Community Credit Union and its 23,000+ members, we appreciate the opportunity to comment on the proposal that would close the Temporary Corporate Credit Union Stabilization Fund (TCCUSF). We believe that closing the fund and providing a rebate to credit unions is the prudent course of action and fully support this action.

We have one significant concern with this proposal and that is the increase in the Normal Operating Level (NOL) of the Share Insurance Fund from 1.30% to 1.39%. This increase in the NOL would decrease the potential rebate available to be distributed to credit unions from \$1.5 - \$1.7 billion to \$600 - \$800 million. This represents a potential decrease of nearly 60%. This is unacceptable. Credit unions supported the Administration when it was most needed and, now that the crisis has passed, the Administration should provide a maximum rebate so that credit unions can reinvest in the credit union and its membership.

The Administration's stance that the NOL needs to be increased by 9 basis points assumes a significant economic downturn which seems overly excessive. Since 2011 NCUA has managed the equity ratio between 1.26% and 1.30% without a premium being charged. A raise in the NOL to 1.39% is not warranted given the recent history of the NOL, therefore credit unions should be provided the maximum rebate in 2018. It is important to note that the FCU Act only allows the Board to assess a premium when the ratio falls below 1.30% and only to raise the ratio to the 1.30% level. It appears that Congress did not believe that an NOL above 1.30% would be unnecessary and would have granted the Board the power to assess a premium above 1.3% if Congress felt it was likely to be necessary.

I would like to thank the Board for the opportunity to comment on this important proposal and encourage the Board to carefully consider our concerns before issuing a final rule.

Sincerely,

Susan Commanda
President and CEO
Hudson River Community Credit Union

