

March 06, 2018

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

RE: Comments on Involuntary Liquidation of FCUs and Claims Procedures

Dear Mr. Gerald Poliquin,

Introductory paragraph:

I am writing on behalf of Pearl Hawaii FCU], which serves [Community]. We have [23,996] members and [\$338,834,518] in assets. [Pearl Hawaii FCU] appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the involuntary liquidation rules and claims procedures.

Letter Body:

Do you agree with the conditions that severance claims must meet to be allowed as provable claims by employees? Why or why not? Yes, protection of the employees

Do the proposed conditions appropriately restrict the provability of severance claims that involve executive level employees with separately negotiated employment contracts or similar benefit plans?

Yes

Summary of your position:

[No problems with proposal.]

Closing paragraph:

Thank you for the opportunity to comment on this proposed rule and for considering our views on the procedures for claims administration for federally insured credit unions that enter involuntary liquidation.

Sincerely,

Gordon Sam
Board Chairperson
Pearl Harbor FCU

cc: CCUL