



July 29, 2019

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

Public Union and Nonmember Shares, RIN 3313-AF00

Dear Secretary Poliquin;

Clearview Federal Credit Union appreciates this opportunity to comment on the NCUA Board's proposal to amend section 701.31 of the NCUA Rules and Regulations dealing with public unit and nonmember shares. Clearview serves consumers and business in the Pittsburgh metropolitan area and has \$1.2 billion in assets and approximately 104,000 members.

The proposed rule would increase the limit on public unit and nonmember shares to fifty percent (50%) of paid-in and unimpaired capital (the current limit is 20%) less any current public unit and nonmember shares. The proposal would eliminate the current waiver process and the alternative \$3 million limit.

We support the rule as drafted. The increased ability to hold additional public unit or nonmember deposits provides credit unions with a reasonable funding source. It offers additional flexibility in terms of balance sheet management. The elimination of the waiver requirements is prudent because the new aggregate limit is 50%.

We would be happy to discuss these comments at your convenience.

Very truly yours,

A handwritten signature in black ink that reads "Thomas R. Garver".

Thomas R. Garver
SVP Risk and Admin
Clearview FCU