

## Deb McNeal

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**From:** John McKenzie  
**Sent:** Monday, May 04, 2015 11:28 AM  
**To:** regcomments@ncua.gov  
**Subject:** Indiana Credit Union League Comments on Proposed Rule 791 and IRPS 15-1

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

### **Re: Indiana Credit Union League Comments on Proposed Rule 791 and IRPS 15-1**

Dear Mr. Poliquin:

The Indiana Credit Union League (ICUL) appreciates the opportunity to submit comments on the National Credit Union Administration's Proposed Rule 791 and IRPS 15-1 which would increase the asset threshold used to define a small entity under the Regulatory Flexibility Act from \$50 million to \$100 million in assets. The ICUL member credit unions represent 96% of assets and members of Indiana's credit unions, with those memberships totaling more than two million consumers.

We support the proposal to increase the small entity definition asset threshold from \$50 million to \$100 million in assets. We appreciate NCUA's proactive response to continue to find ways to reduce the regulatory burden on small credit unions. We encourage NCUA to continue to review the asset threshold for small entities given that other regulatory agencies have significantly higher asset thresholds, such as the FDIC's \$550 million threshold.

We do have concerns that NCUA needs to carefully prioritize its existing resources so that the Office of Small Credit Union Initiatives (OSCUI) has sufficient resources to provide the intended services to federally insured credit unions with assets less than \$100 million. In particular, services to the smaller credit unions within this group should be a priority. Credit unions that would most benefit from OSCUI's services are finding it more difficult to compete in this much larger pool of potential service users. We encourage NCUA look at developing some processes that place a greater emphasis on access to OSCUI's services by credit unions with assets less than the current small entity threshold of \$50 million. This could be in the form of allocating a certain percentage of OSCUI's resources to various asset categories to more equitably distribute services to smaller credit unions that would greatly benefit from them.

In summary, we support NCUA's proposal to increase the small entity threshold from \$50 million to \$100 million in assets. We believe that NCUA should consider increasing the threshold even higher to expand the regulatory relief that this definition can provide. We also encourage NCUA to review the OSCUI methodologies for providing services in order to increase the likelihood that smaller credit unions within this expanded small credit union definition have a good opportunity to receive these services.

Thank you for the opportunity to comment on the proposal. If you have any questions about our letter, please do not hesitate to give me a call at (317) 594-5320.

Sincerely,

John McKenzie  
President, Indiana Credit Union League