Indiana Credit Union League

The association of Indiana credit unions

December 5, 2022

Ms. Melane Conyers-Ausbrooks
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

Re: Subordinated Debt; RIN 3133–AF43

Dear Ms. Conyers-Ausbrooks:

The Indiana Credit Union League (ICUL) appreciates the opportunity to submit comments on the NCUA's proposed changes to subordinated debt rule. The ICUL member credit unions represent 99% of assets and members of Indiana's credit unions, with those memberships totaling more than 2.8 million consumers.

We agree with the proposed extension of the regulatory capital treatment for grandfathered secondary capital to the later of 30 years from the date of issuance or January 1, 2052. This proposed extension would align with the maximum permissible maturity for any secondary capital issued to the U.S. government or one of its subdivisions. We agree that this change is necessary to enable low-income credit unions (LICUs) that are participating in the Treasury Department's Emergency Capital Investment Program (ECIP) to receive the program's maximum benefit. As noted by the NCUA, capital with longer maturities helps credit unions make more loans to underserved communities and improve the economic well-being of members in these areas.

The ICUL believes the required application information to issue notes with maturities longer than 20 years appears reasonable. For consistency purposes, we ask the NCUA to consider moving the application decisioning from NCUA's regional offices to a centralized location.

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

Sincerely,

John McKenzie

John McKenzie, President
Indiana Credit Union League