



**Indiana Credit Union League**  
*The association of Indiana credit unions*

July 6, 2020

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

RE: NCUA Proposed Rule – Joint Ownership Share Accounts, RIN 3133-AF11

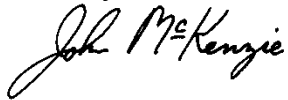
Dear Mr. Poliquin:

The Indiana Credit Union League (ICUL) appreciates the opportunity to submit comments on the National Credit Union Administration's Proposed Rulemaking regarding joint ownership share accounts. The ICUL member credit unions represent 99% of assets and members of Indiana's credit unions, with those memberships totaling more than 2.6 million consumers.

We support the proposed change because it is similar to the Federal Deposit Insurance Corporation's requirements, and most importantly, it provides the assurance of insurance coverage for members and joint owners. In the event a credit union is unable produce an account/signature card, other methods can accurately prove ownership (e.g., access methods, transactions, etc.). Insurance coverage should not be limited to an account/signature card, and we support NCUA's proposed change. We also support insurance parity with FDIC and the bank industry.

We appreciate the opportunity to comment on the proposed rule. 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