



DCUC
DEFENSE CREDIT UNION COUNCIL

1627 Eye St, NW
Suite 935
Washington, DC 20006

202.734.5007
www.d cuc.org

Jason Stverak
Chief Advocacy Officer

May 26, 2026

Melane Conyers-Ausbrooks
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Delivered electronically via: <https://www.regulations.gov>

RE: Chartering and Field of Membership [NCUA-2026-0661]

Dear Ms. Conyers-Ausbrooks:

On behalf of the Defense Credit Union Council (DCUC),¹ thank you for the opportunity to comment on the National Credit Union Administration's (NCUA) proposed rulemaking to amend the associational common bond requirements for chartering and field of membership (FOM). DCUC represents credit unions that serve active-duty military, veterans, and their families worldwide.

DCUC supports the NCUA's proposed rulemaking. The proposal would amend language in the NCUA's Chartering and Field of Membership Manual (Manual) that otherwise creates an automatic bar beyond the requirements of the Federal Credit Union Act (FCUA) rather than allowing the NCUA to evaluate the totality of the circumstances.² Specifically, the proposed new language in the Manual would clarify that requiring the purchase of a product or service as a condition of membership does not automatically disqualify an otherwise legitimate association from the FCUA's associational common bond provisions. Instead, in reviewing applications to determine eligibility, the NCUA would consider the entirety of the circumstances such as the group's structure, scope and degree of its activities, and other operational factors to conclude whether its relationship with its members is primarily or incidentally a client-customer relationship.

We agree with the NCUA's proposed illustrative example that an association that offers insurance, even as a condition of membership, may qualify as having a valid associational common bond if the client-customer relationship is incidental in relation to the association's activity and overall circumstances. The proposed language reflects the statutory intent of the FCUA because it appropriately focuses on the totality of the association's activities rather than imposing a categorical prohibition based solely on the existence of a required client-customer relationship, as the Manual's current example does. This revised example more accurately clarifies the requirements for an associational common bond.

¹ The Defense Credit Union Council represents more than 200 defense-affiliated credit unions and over 40 million members—including active-duty servicemembers, Guard and Reserve personnel, veterans, Department of Defense civilians, and military families.

² See 12 CFR part 701, app. B.

DCUC appreciates the NCUA Board's efforts to modernize and streamline the agency's regulatory requirements while preserving operational flexibility for credit unions. We look forward to continuing to work with the NCUA on future initiatives that enhance regulatory clarity, improve operational flexibility, and reduce unnecessary compliance burden.

Please contact me at Jason.Stverak@dcuc.org with any questions about DCUC's comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jason Stverak", with a long horizontal flourish extending to the right.

Jason Stverak
Chief Advocacy Officer
DCUC