



**DCUC**  
DEFENSE CREDIT UNION COUNCIL

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**Jason Stverak**  
Chief Advocacy Officer

March 30, 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: Termination of Excess Insurance Coverage [NCUA-2026-0135]

Dear Ms. Conyers-Ausbrooks:

On behalf of the Defense Credit Union Council (DCUC),<sup>1</sup> thank you for the opportunity to comment on the National Credit Union Administration's (NCUA) proposed rule to amend its regulatory requirements for obtaining and maintaining federal share insurance with the National Credit Union Share Insurance Fund. This proposed rule would reduce regulatory burden by amending the provision on the timing of prior notice provided to members of the termination of excess non-federal insurance coverage. DCUC represents credit unions that serve active-duty military, veterans, and their families worldwide.

DCUC supports the NCUA's proposed rule to remove the 30-day written notification requirement in § 741.5 of NCUA's regulations to provide credit unions flexibility in notifying members before the termination of any excess share insurance coverage beyond that provided by the Share Insurance Fund. In practice, the 30-day requirement can create operational constraints for credit unions needing additional flexibility. While this rule appropriately retains the requirement to provide advance notice to members prior to the termination of excess share insurance coverage, eliminating the prescriptive 30-day notice requirement allows credit unions to control the timing of the notice more tightly.

We agree with the NCUA that this is an appropriate change to the regulation, as the 30-day notification for terminating any excess insurance is not required under the Federal Credit Union Act and therefore, is an area where regulatory discretion can be exercised to reduce compliance burden.

DCUC appreciates the NCUA Board's efforts in streamlining and modernizing its regulatory requirements. We encourage the agency to continue engaging with the credit union industry through listening sessions and other outreach to identify additional opportunities to improve regulatory clarity and reduce unnecessary compliance burden. Please feel free to use us as a resource to assist in these efforts.

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<sup>1</sup> 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.

Please contact me at [Jason.Stverak@dcuc.org](mailto:Jason.Stverak@dcuc.org) with any questions regarding DCUC's comments or other matters that impact the credit union industry.

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