



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: Requirements for Insurance; Maximum Borrowing Authority [NCUA-2026-0134]

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 rule regarding maximum borrowing authority as a condition of federal share insurance. Specifically, this rulemaking would remove the maximum borrowing authority from the NCUA's regulations governing the requirements for obtaining and maintaining federal share insurance with the National Credit Union Share Insurance Fund. DCUC represents credit unions that serve active-duty military, veterans, and their families worldwide.

DCUC supports the NCUA's proposed rule to remove § 741.2 from its regulations. The current provision is duplicative for federal credit unions (FCUs), as the statutory 50 percent borrowing limit is established in the Federal Credit Union Act and implemented in part 701 of the NCUA's regulations. Eliminating this redundant regulatory requirement will streamline the NCUA's regulations without impacting the legal obligations for FCUs.

For federally insured state-chartered credit unions (FISCUs), § 741.2 imposes a regulatory requirement not required by statute. Its removal will restore flexibility, reduce administrative burden, and reinforce the dual chartering system. Eliminating the waiver process will further improve regulatory efficiency for both credit unions and the NCUA.

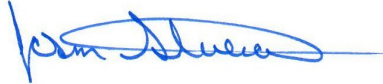
Importantly, removing § 741.2 simplifies compliance for FISCUs and reduces redundancies for FCUs without diminishing the safety and soundness of the credit union system. Borrowing activity and related risks will remain subject to ongoing supervisory oversight by the NCUA and/or state regulators. We trust that any issues regarding the maximum borrowing authority and safety and soundness can be addressed by examiners during this oversight.

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.

DCUC appreciates the NCUA Board's proposed rulemaking and its ongoing efforts to streamline and modernize 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. We look forward to assisting the agency in these efforts.

Please contact me at 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