



**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: Public Unit and Nonmember Shares [NCUA-2026-0133]

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 public unit and nonmember share rule. Specifically, the proposal would remove the requirement for a written plan to document the intended use of any borrowings, public unit, or nonmember shares if, collectively, those funds exceed 70 percent of the credit union's paid-in and unimpaired capital and surplus. DCUC represents credit unions that serve active-duty military, veterans, and their families worldwide.

DCUC supports the NCUA's proposed rule. We agree that the requirement under § 701.32(b)(2) is unnecessarily prescriptive and imposes a compliance burden without providing safety and soundness benefits. Credit unions already operate under robust supervisory expectations related to liquidity risk, concentration risk, and balance sheet management. Requiring a separate written plan when certain funding thresholds are met is duplicative and unnecessary given existing risk management practices and NCUA oversight. Particularly for smaller and low-income designated credit unions, this extra requirement diverts limited resources away from more mission-critical activities. Given this regulatory provision is not mandated by the Federal Credit Union Act, its removal appropriately restores flexibility for federally insured credit unions while preserving the NCUA's supervisory process to address emerging risks and take appropriate action where warranted.

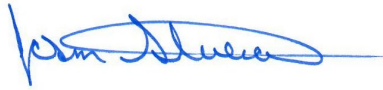
DCUC appreciates the NCUA Board's efforts in streamlining and modernizing its regulatory requirements. We encourage the agency to continue engaging with the credit union industry through listening sessions and other outreach to identify additional opportunities to improve regulatory clarity and reduce unnecessary compliance burden. DCUC stands ready to support the NCUA's 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 about 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