



DCUC
DEFENSE CREDIT UNION COUNCIL

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Jason Stverak
Chief Advocacy Officer

July 2, 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 [NCUA-2026-0993]

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 to amend its regulations governing the requirements for share insurance. DCUC represents credit unions that serve active-duty military, veterans, and their families worldwide.

DCUC supports the NCUA's recent efforts to streamline its regulatory requirements. However, we do not believe this specific proposal would meaningfully reduce regulatory burden or improve compliance for federally insured credit unions. These proposed changes would eliminate a centralized section that lists the substantive provisions for federal credit unions and federally insured state-chartered credit unions that are codified in other NCUA regulations. While this simplification could help some credit unions by limiting the amount of regulatory text they must review, it would also prevent other credit unions from having a useful way to review which NCUA regulations apply to them.

The existing cross-references serve as a practical compliance aid by identifying related regulatory provisions that credit unions should consider when evaluating their share insurance obligations. Eliminating those references may simplify the text of Part 741, but it also removes useful context that helps credit unions understand how the NCUA's regulatory framework operates and identify the regulatory requirements applicable to federally insured state-chartered credit unions. In short, the existing cross-references provide value beyond simply restating other regulatory requirements.

DCUC encourages the NCUA Board to prioritize its deregulatory efforts on reforms that provide measurable reductions in compliance burden or operational complexity for credit unions. We also encourage the NCUA to supplement its notice-and-comment process with periodic roundtables and stakeholder listening sessions to better identify regulatory provisions that impose unnecessary burden or create operational challenges for credit unions. Regarding this proposal,

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 respectfully encourages the NCUA Board to reconsider whether the proposal provides sufficient regulatory benefit to justify adoption in its current form.

As always, DCUC remains available as a resource on issues affecting credit unions and the members and communities they serve. 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 horizontal line extending to the right.

Jason Stverak
Chief Advocacy Officer
DCUC