



DCUC
DEFENSE CREDIT UNION COUNCIL

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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: Thresholds Increase for the Major Assets Prohibition of the Depository Institution Management Interlocks Act [NCUA-2026-0992]

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 increase two thresholds in its regulation implementing management official interlocks for purposes of the Depository Institution Management Interlocks Act (DIMIA). DCUC represents credit unions that serve active-duty military, veterans, and their families worldwide.

DCUC supports the NCUA's proposal to increase the major assets prohibition thresholds to \$10 billion. The proposed rule appropriately recognizes the substantial growth of federally insured depository institutions since the thresholds were established in 1996, and better aligns the regulation with today's financial services marketplace. Periodic adjustments to regulatory thresholds are essential to ensure that regulatory requirements continue to apply to the institutions Congress intended. Maintaining outdated asset thresholds unnecessarily subjects additional credit unions to restrictions that were intended to apply only to the largest institutions whose management interlocks could raise competitive concerns. Increasing both thresholds to \$10 billion right sizes the regulation, reduces unnecessary regulatory burden, and better reflects the DIMIA's purpose of preventing anticompetitive management interlocks while avoiding unnecessary restrictions on institutions that pose little competitive risk.

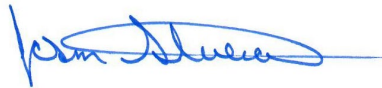
DCUC also agrees with the NCUA's decision to establish a single \$10 billion threshold for both institutions involved in a proposed interlock. This uniform threshold simplifies the provision, promotes regulatory certainty, and is consistent with the broader approach federal financial regulators, such as the Board of Governors of the Federal Reserve, the Consumer Financial Protection Bureau, and others, have taken in distinguishing between community institutions and larger financial institutions for regulatory purposes.

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.

Finally, the primary goal of the NCUA's Deregulation Project is to improve supervision, streamline regulations, and remove excessive compliance burden for credit unions. Therefore, DCUC disagrees with the NCUA's proposal to remove the rebuttable presumption that an interlock involving institutions controlled or managed by members of a minority group or women would not result in a monopoly or substantially lessen competition. NCUA has not demonstrated that eliminating this presumption would achieve its goals of improved supervision or regulatory and compliance relief. Retaining the existing presumption preserves regulatory certainty while imposing little administrative burden. DCUC therefore urges the NCUA Board to retain this provision in the final rule.

DCUC appreciates the NCUA's efforts to modernize and streamline its regulations. We remain 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 regarding these comments.

Sincerely,



Jason Stverak
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DCUC