DCUC
DEFENSE CREDIT UNION COUNCIL

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Jason Stverak
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Clinton Jones
General Counsel
Attention: Comments/RIN 2590-AB52
Federal Housing Finance Agency
400 Seventh Street SW
Washington, DC 20219

Delivered electronically via: https://www.regulations.gov

RE: Repeal of the Federal Home Loan Bank New Business Activities Regulation Proposed Rule [(RIN) 2590-AB52]

Dear Mr. Jones:

On behalf of the Defense Credit Union Council (DCUC),[1] thank you for the opportunity to comment on the Federal Housing Finance Agency's (FHFA) notice of proposed rulemaking repealing the New Business Activities (NBA) Regulation. DCUC represents credit unions that serve active-duty military, veterans, and their families worldwide.

DCUC supports the FHFA's repeal of part 1272. This current requirement has a minimal impact on the Federal Home Loan Banks' (FHLB) deployment of new products and services to their members as very few of the banks' new business activities rise to the risk level that would trigger an NBA notice submission. Furthermore, without this provision, the FHLBs are still subject to ongoing prudential supervision through the FHFA's examination function which includes the development of NBAs, and any legal, policy, or supervisory issues can be raised during this process. FHLBs also have an incentive to involve the FHFA early in the process when developing an NBA to avoid any future issues that are costly or drain resources. Overall, requiring submission of an NBA notice under part 1272 is duplicative and unnecessary, and this regulatory change will not negatively impact the safety and soundness of the FHLBs.

[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.

1272 is duplicative and unnecessary, and this regulatory change will not negatively impact the safety and soundness of the FHLBs.

DCUC appreciates the opportunity to comment on this notice of proposed rulemaking. We remain available to the FHFA 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,

Jason Stverak
Chief Advocacy Officer
DCUC