



March 19, 2019

Todd Harper
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314

Re: Confirmation to National Credit Union Administration Board

Dear Mr. Harper,

The Ohio Credit Union League (OCUL) writes to express our congratulations on your recent U.S. Senate confirmation to the National Credit Union Administration's (NCUA) Board. As Ohio's state trade association representing the state's 267 credit unions and their more than three million members, we look forward to working with you in this new capacity.

As you are aware, Ohio is home to 145 federally-chartered and insured credit unions, 73 state-chartered, federally-insured credit unions, and 49 state-chartered, privately-insured credit unions. The dual-charter system is recognized in 47 states and provides choice as to whom will serve as their institution's chartering authority and prudential regulator. In Ohio, that ratio leans to the federal-charter from a credit union number standpoint, while the majority of assets are held by state-chartered credit unions. Yet, NCUA has direct influence over the super-majority of our credit unions as their federal insurer. The dual-chartering system nourishes greater diversity of credit unions and reflects the specific needs of their unique membership.

The efficient and effective operating environment required for credit unions to survive is not only dependent upon the dual-charter system, but is influenced largely by federal agencies and consumer protection regulations, many of which NCUA oversees or works collaboratively on in conjunction with other federal agencies.

We believe NCUA is best equipped to create an efficient and effective operating environment for credit unions when the full, three-person board at NCUA is filled, which is why we were excited the U.S. Senate confirmed you and Mr. Rodney Hood on March 14th.

For the past two years, NCUA has worked diligently to reduce the regulatory burden through its Regulatory Reform Task Force. Moving forward, four priorities in which OCUL would like to work with the Board are:

1. Maintaining NCUA's status as an independent regulator and insurer;
2. Modernizing the Federal Credit Union Act;
3. Strengthening the dual-charter system; and,
4. Fostering innovation at the agency and throughout credit unions to ensure credit unions remain relevant in the financial services marketplace.

OCUL looks forward to collaborating with the agency and working with you as a new Board member. If you have questions or would like to discuss OCUL's comments in more detail, please feel free to contact us at 800-486-2917.

Respectfully,

Paul L. Mercer
President

Miriah Lee
Regulatory Counsel

