



October 30, 2020

Mr. Gerald Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

RE: Fees Paid by Federal Credit Unions; RIN 3133-AF24

Dear Mr. Poliquin,

The Ohio Credit Union League (OCUL) represents the collective interests of Ohio's 251 credit unions and their more than three million members. Of those 251 credit unions, 138 are federally-chartered; 67 state-chartered, federally insured; and, 46 state chartered, privately-insured.

OCUL appreciates the opportunity to comment on the National Credit Union Administration's (NCUA) proposed rule regarding Fees Paid by Federal Credit Unions. We support the proposed changes in their entirety and, specifically:

1. We support the proposed change to a four-quarter average of reported assets in calculating the operating fee because we agree that this change will address seasonality and provide greater certainty of upcoming operating fees. This change would also reduce the risk of collection related discrepancies in terms of NCUA's operating fees. We recommend that NCUA regularly review this change and its impact to ensure it does not cause unintended consequences, such as a significant or inaccurate change in the annual operating fee.
2. We support the proposed exclusion of Paycheck Protection Program (PPP) loans from a federal credit union's total assets for purposes of calculating its operating fee. This change should help ensure that federal credit unions interested in making PPP loans do not bear greater financial burdens for doing so.
3. We support the proposal to incorporate a general statement in the regulation that contemplates the NCUA's exclusion of loans made under government sponsored and administered special relief programs like the PPP from total assets when calculating operating fees. This would provide the NCUA with flexibility to consider excluding assets related to future programs that may develop on short notice, particularly in cases where including such assets may create a disincentive for federal credit unions to participate.

Thank you again for the opportunity to comment on the proposal regarding Fees Paid by Credit Unions. We are in full support of this proposed rule, and we appreciate the agency's willingness to support credit unions with common sense regulations during this trying time. If you have further questions or would like to discuss OCUL's comments in more detail, please feel free to contact us at (800) 486-2917.

Respectfully,

Handwritten signature of Paul L. Mercer in black ink.

Paul L. Mercer
President

Handwritten signature of Chris Noble in black ink.

Chris Noble
Regulatory Counsel