NASCUS
The National Association of State Credit Union Supervisors

July 6, 2026

Melane Conyers-Ausbrooks
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

**RE: Comments on Proposed Rule – 12 CFR 711.3(c) – Thresholds Increase for Major Assets Prohibition of the Depository Institution Management Interlocks Acts Rule**

Dear Ms. Conyers-Ausbrooks:

The National Association of State Credit Union Supervisors[1] (NASCUS) appreciates the opportunity to submit comments on the National Credit Union Administration's (NCUA) proposed amendments to 12 CFR Part 711 Thresholds Increase for the Major Assets Prohibition of the Depository Institution Management Interlocks Act.[2] NASCUS supports NCUA efforts to increase the major assets prohibition thresholds from $1.5 billion and $2.5 billion to $10 billion.

NASCUS agrees the proposed changes will better reflect market growth since the 1996 establishment of the limits and will reduce the number of organizations currently required to seek exemptions. NASCUS also agrees that increasing the thresholds to $10 billion, consistent with the adjustments made by the other federal banking agencies in 2019, will reduce the number of credit unions that must currently rely on these exemptions when identifying qualified candidates.

## Conclusion

NASCUS supports NCUA's proposed amendment related to 12 CFR 711.3(c). We appreciate the opportunity to comment and welcome continued collaboration with the NCUA as the supervisory framework evolves.

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[1] NASCUS is the professional association of the nation's forty-five state and territorial credit union regulatory agencies that charter and supervise 1,755 state credit unions. NASCUS membership includes state regulatory agencies, state chartered and federally chartered credit unions, and other important stakeholders in the state system. State-chartered credit unions hold approximately half of the $2.4 trillion assets in the credit union system and are proud to represent nearly half of the 145 million members. The remaining six states lack state-chartered credit unions.
[2] Thresholds Increase for the Major Assets Prohibition of the Depository Institution Management Interlocks Act, 91 Fed. Reg. 24748 (May 7,2026).

Sincerely,

-signature redacted for electronic publication -

Craig Money
Vice President,
Regulatory Affairs &
AML/AFC Compliance