



CORNERSTONE LEAGUE

*Uniting & Inspiring Credit Unions
to Advance the Greater Good*

June 22, 2026

Melane Conyers-Ausbrooks, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428

**Re: Comment Letter - Bank Conversions and Mergers, Subpart C-Merger of
Insured Credit Unions Into Banks
Docket No. NCUA- 2026-0982**

Dear Secretary Conyers-Ausbrooks,

I write on behalf of the Cornerstone Credit Union League ["Cornerstone"]. Cornerstone represents nearly 600 state and federal credit unions in a 5-state region which includes Arkansas, Kansas, Missouri, Oklahoma, and Texas. Thank you for the opportunity to voice our comments and suggestions.

Cornerstone appreciates the NCUA's efforts to reduce outdated or burdensome regulations and supports the proposed amendments to 12 C.F.R. 708a removing overly prescriptive, unnecessary, and largely outdated requirements related to credit union conversions and mergers. The proposal emphasizes streamlined reporting, focuses on substantive outcomes rather than formatting, and removes ambiguous language.

These actions reduce unnecessary regulatory burdens and provide credit union boards of directors with greater flexibility to exercise their business judgment. They also will simplify compliance and provide credit unions with greater flexibility in designing effective communications, while still ensuring that members receive clear and prominent notice of a proposed termination of federal insurance.

Cornerstone supports NCUA's review and update of regulations under Executive Order 14192, Unleashing Prosperity Through Deregulations, and believes that balancing regulatory impact and consumer benefits ensures operational efficiency and maintains safety and soundness.

Should you have any questions or require additional information, please feel free to contact me at the email or phone number provided below.

Sincerely,

Suzanne Yashewski
Cornerstone Credit Union League
Direct phone: (512) 853-8516
Email: syashewski@cornerstoneleague.coop