

March 06, 2014

Federal Reserve Board
Secretary, Board of Governors
20th Street and Constitution Avenue, NW
Washington, DC 20551

RE: Comments on Proposed Rule - Extensions of Credit by Federal Reserve Banks; Docket No. R-1476

Dear Robert deV. Frierson,

This comment letter represents the views of Credit Union of Southern California (CU SoCal) regarding the Federal Reserve Bank's proposed rule regarding Regulation A (Extensions of Credit by Federal Reserve Banks). CU SoCal has 59,000 members and \$710 million in assets. We appreciate the opportunity to provide these comments to the Federal Reserve.

Support of the Proposed Regulation

CU SoCal supports the proposed regulatory changes to implement the Dodd Frank Act amendments that limit the Fed's emergency lending program or facility for the purpose of providing liquidity to the financial system.

We understand that this authority to extend credit would be used in unusual and exigent circumstances. Further it would require the affirmative vote of not less than five Fed members, subject to conditions and periods, to extend credit to any participant in any program or facility with broad-based eligibility. Further, a program of this nature would require prior approval of the Treasury Secretary.

We completely agree that a program of this nature must have broad-based eligibility, designed to provide liquidity to an identifiable market or sector of the financial system. This program is not to aid a failing financial company, not structured to remove assets from the balance sheet of a company, and is not established to assist a single and specific company to avoid bankruptcy or any other insolvency proceeding.

Finally, we understand that the proposed changes are not intended to affect discount window lending to depository institutions, such as credit unions and banks.

CU SoCal applauds the Federal Reserve Bank for their efforts to implement this guidance from the Dodd Frank Act. Unusual circumstances require irregular solutions, as has occurred in the recent past. We would encourage any efforts to clarify the guidance in like circumstances for the future.

Sincerely,

Rick Hoffman
VP, Business Development and Legislative Affairs
Credit Union of Southern California

cc: CCUL