



August 11, 2011

Mary Rupp, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428
Email: regcomments@ncua.gov

Re: Comments to the Proposed Amendments to the NCUA Regulations re: CUSOs 12 CFR Parts 712 and 741

Dear Ms. Rupp:

Please be advised that Members Resource, LLC opposes the above referenced Amendment to the NCUA Regulations regarding CUSOs for the following reasons.

Our CUSO provides Mortgage and Insurance services to 15 small to medium sized credit unions and their members. Without a CUSO, many of our partners' members would be forced to turn to other institutions to meet their financial needs. In most cases, as in ours, CUSO services are already heavily regulated by their respective industries, anyway.

CUSOs help credit unions *earn* and *save* millions of dollars, and there is no evidence that they pose a risk. NCUA already has the ability to examine the books and records of CUSOs and exercise full control over the credit unions to resolve any safety and soundness issues. Why add additional costs and burden to CUSOs and their already **stressed** parent credit unions? Is there any indication that CUSOs had anything to do with the financial difficulties in the credit union industry?

We ask the NCUA to withdraw the proposed Amendment.

Sincerely,

A handwritten signature in black ink that reads "Cindy A. Harbison".

Cindy A. Harbison
President VCU CUSO Operations
Members Resource, LLC
Mortgage Solutions, LLC
CUIA, LLC
314-264-5351
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cc. The Honorable Debbie Matz, Chairman
The Honorable Michael Fryzel, Board Member
The Honorable Gigi Hyland, Board Member