

Clawson Community
Credit Union

625 N. Main Street
Clawson, MI 48017

248-435-0950
248-435-7845 Fax



August 16, 2011

Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Ms. Rupp:

I am writing in response to the NCUA's proposed rulemaking for CUSO Regulation. I oppose regulations which do not create unique and industry specific value. They are simply redundant and unnecessary. A request for power should be accompanied by a full plan that discloses both the need for power and the intention of its use.

CUSOs help credit unions earn and save millions of dollars under the current regulatory model. **There is no evidence that CUSOs pose a systematic risk to credit unions to require regulatory changes.**

NCUA's information disclosure and regulation of CUSOs will stifle the ability of CUSOs to innovate and provide collaborative solutions. Credit Union need every helping hand to substain them in the upside world created by government agencies who did not do their job and allowed the crisis we face today.

By imposing regulatory burdens on them, CUSOs will be put at a competitive disadvantage with non-CUSO competitors, exposing private business secrets to public dissemination through FOIA requests. CUSOs are the collaborative arm of credit unions trying to solve operational and financial issues for credit unions. Credit unions face unnecessary hurdles placed in their path as they seek solutions to their sustainability by the NCUA, who you'd think would be championing our existence.

Please reconsider the need, the value and the burden of this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Char Larson".

Char Larson
President & CEO