



**September 16, 2011**

**Mary Rupp, Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexander, Virginia 22314-4328**

SEP20'11 PM 3:32 BOARD

**Dear Ms Rupp:      Re: Comment on the Proposed Amendments to the NCUA  
Regulations on Credit Union Service Organizations,  
12 CFR Parts 712 and 741**

**I am the Interim President & CEO of a 125 million dollar credit union in Birmingham, Alabama. We have two wholly owned CUSOs and are members of three other CUSOs. We feel that all these CUSOS serve a purpose for this credit union.**

**I retired from Guardian Credit Union, Montgomery, Alabama, having served as their CEO for 27 years and having a total of 53 years in the credit union movement. I was brought in to this credit union on February 28, 2011, after the prior management was dismissed for having committed some illegal acts. In fact the prior CEO is due to be sentenced by the Federal Court this month. We have hired a new CEO; therefore, I will be going back into retirement in another six weeks.**

**In my 53 years in the credit union movement I have seen a lot of changes, some good and some bad, but we have just been regulated to death. I spend more and more of my time dealing with regulations and less and less of my time executing my duties as CEO of this credit union. I know we have to have some regulations but the amount we now have is excessive to say the least.**

**This regulation is not needed because this is an area that NCUA does not need to be in; therefore, I request that it be withdrawn.**

**Sincerely yours,**



**Landel Casey**  
**Interim President & CEO**