



September 26, 2011

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

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

Dear Ms. Rupp,

We appreciate the opportunity to comment on the proposed changes to CUSO 12 CFR 712 and 741. Genisys Credit Union wholly owns two CUSOs and has relationships with several multi-owned CUSOs. Our relationships with the multi-owned CUSOs include partial equity ownership and board representation.

Innovation and collaboration have been the hallmarks of success for CUSO affiliation by both natural person credit unions and corporates. These relationships are unique and have driven significant savings and income to our credit union allowing us to offer enhanced, value added products and services to our membership. We would certainly be at a competitive disadvantage to banks without the advent of Credit Union Service Organizations and the successes that CUSO products and services have brought to the credit union industry.

We were surprised to learn of the proposed amendments that would require CUSOs to submit their financial statements and business plans directly to the NCUA. We believe that the additional reporting burden would put CUSOs at a severe competitive disadvantage to bank subsidiaries and that the regulatory controls currently in place are more than sufficient to identify any potential risk exposure. In our opinion the proposed amendments are unwarranted and would jeopardize the successes that CUSOs have brought to credit unions and countless members. We strongly oppose this proposed new regulation.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerald Strausbaugh".

Gerald Strausbaugh
Senior Vice President, Chief Financial Officer

cc: The Honorable Debbie Matz, Chairman
The Honorable Michael Fryzel
The Honorable Gigi Hyland