From:	Gerald Hutto
To:	_Regulatory Comments
Cc:	Veronica.Madsen@mcul.org
Subject:	Comments on Notice of Proposed Rulemaking for Parts 700, 701, 741,ad 750
Date:	Wednesday, August 01, 2012 3:27:18 PM

Good Afternoon,

We are a state chartered credit union in Michigan and examined by OFIR and NCUA. I feel that the state examiners are much more familiar with the credit unions in the state, the challenges they face both economic and regulatory, than NCUA examiners. If there are issues or concerns about an operation they are shared with NCUA and together they can make a decision based on the facts. By having NCUA come in and be able to determine a "troubled" credit union they are taking authority away from the state that chartered the institution and has done the examinations. You are also indicating to the state examiners/regulators that they may not be qualified to determine the status of a credit union. It would also seem to me that the state examiners would be more aware of any "financial stress" a credit union faces without NCUA intervention. The term "financial stress" is also very open to interpretation and I for one would rather have a state chartered agency determine this. It does seem that the NCUA is trying to over ride or diminish the regulatory responsibility of the state and put on a federal level.

Thank you for your time and consideration.

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