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August 21, 2006

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Kokomo Branch
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Kokomo, IN 46902
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IU Southeast Branch
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New Albany, IN 47150
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IU South Bend Branch
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South Bend, IN 46615
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Ms. Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-342

Re: Proposed Rule Part 708a

Dear Ms. Rupp:

On behalf of Indiana University Employees Federal Credit Union, we appreciate the invitation to comment on proposed changes to Part 708a of NCUA's Rules and Regulations regarding charter conversions.

We fully support your objective to preserve the interests of the member/owners and have endorsed the agencies efforts to bring more transparency into the conversion process. However, the excessive requirements in this proposal appear to be an indictment of credit union leaders industry-wide in response to isolated cases of self-interest by a few.

In any event, the proposed rules make a credit union's alternative to convert to a mutual savings bank charter impractical and exceedingly costly. In particular, onerous aspects of the notice requirements, complex balloting procedures, access to records and dissident communication hosting requirements are ill advised and set dangerous precedent. We encourage NCUA to focus on issues that strengthen the credit union charter rather than building a higher regulatory fence that, in effect, limits future strategic options.

In light of our enduring commitment to the credit union charter, we feel that we have standing to comment objectively as a stakeholder on these proposed regulatory changes. Although the current rules do not represent great public policy, on balance we believe the conversion process is

adequately controlled by the existing statute and regulation and strongly urge the NCUA Board to reject the modifications as drafted to Part 708a.

Thank you for your consideration of our comments on the proposed changes. We appreciate your diligent effort to maintain the philosophy and integrity of America's credit unions.

Sincerely,



Bob Newcomb
President/CEO
U Credit Union