



307 West Meeker
 Puyallup, WA 98371
 (253) 841-2668
 Fax (253) 841-3835
 pcefcu@juno.com

March 30, 2009

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

RE: Puyallup City Employees Federal Credit Union Comments on Advanced Notice of Proposed Rulemaking for Part 704 Regarding Corporate Credit Unions

Dear Ms. Rupp,

As time draws near to close the books for March 2009, credit unions across the country have been instructed by the National Credit Union Administration, NCUA, to make the most difficult accounting entry that any credit union has ever had to make. One that will surely be the end of some of the best credit unions to ever open its doors and cause a great many others to post the most catastrophic loss in their history. This, at a time when the economy and member confidence is at an all time low. Not only are our members suffering personal financial losses but are now seeing their most trusted financial institutions struggling as well. This credit union, Puyallup City Employees Federal Credit Union, is struggling with making that accounting entry knowing we are letting our members down. We are the stewards of their money and we are supposed to keep it safe for them.

NCUA is supposed to be the one entity that credit unions could look to for guidance and leadership. Our credit union went thru some very difficult times in 2006 and we were fortunate enough to have an NCUA examiner give us just that. We were made to feel important and that our credit union mattered to them. Now, PCEFCU feels that NCUA has let them down. NCUA is supposed to make sure that all credit unions both corporate and natural persons follow all the stacks of rules and regulations that are piled on top of them year after year. Why is it that natural person credit unions are supposed to increase their loans by pulling them out of the air at a time when their members aren't borrowing funds but corporate credit unions have been permitted to totally bring the credit union industry to the brink of destruction?

What about the small credit unions that have struggled back from the brink of extinction? NCUA wasn't there for those credit unions with a wallet full of cash. Those credit unions did it by perseverance, hard work and a dedication to their credit union and their members. Unfortunately because of the recent actions taken by NCUA and their lack of supervision on our corporate credit union system, these same credit unions may find that their wings have once again been clipped and maybe this time too short to grow back.

Although our credit union will make that ill fated accounting entry before we close our books for the month, we stand united in saying that this Board could not idly sit back and allow NCUA to take away what our credit union and membership took 42 years to build without making our voices heard. NCUA has managed to do in one motion of the pen what they have been trying to accomplish for years and that is to eliminate as many small credit unions as possible and turn the credit union industry into one big, impersonal, sterile and cold industry. We hope our members will forgive us and we can someday earn their trust once again.

Sincerely,



Board of Directors,
Puyallup City Employees Federal Credit Union
Charter #18068

- Carl Groseclose, President
- Scott Engle, Vice President
- Kerry Stoner, Secretary
- Mike Guy, Director
- Don Hodges, Director
- Carolyn Jones, Director
- Robert Thompson, Director
- Peggy Watson, Director
- Steve Wheeler, Director