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From: Candy Bracewell [Candyb@LGEccu.org]
Sent: Friday, April 03, 2009 2:08 PM
To: _Regulatory Comments
Subject: ANPR for Corporate Restructuring

Mary Rupp
Secretary to the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

Dear Ms. Rupp:

I would like to respond to several issues within the ANPR for Corporate Restructuring. As SVP/CFO of LGE Community CU, we are strong supporters of Georgia Central CU (GCCU). They provide critical payment systems, liquidity services and investment opportunities to our Credit Union.

I believe the payment systems are essential for corporates to provide. I do not think the corporates could provide these services if they were separated from the other services currently offered. GCCU provides these services very efficiently and inexpensively.

We are a strong lender and have very volatile cash flow; we frequently depend on overnight borrowing from GCCU. We also have a LOC with the FHLB Atlanta that we use for longer term borrowing. This structure has proved to be very cost effective and again easy for LGE. I strongly believe that corporates should continue to be a liquidity source for CUs.

We are members of Southwest Corporate FCU also. We have only utilized SW for investments since we do not hold capital with them. In order to secure the corporate system, I would support regional versus national FOMs for corporates.

Thank you for your attention to my opinions.

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