



March 1, 2010

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

Dear Members of the Board:

We would like to comment on behalf of the CEO and the Board of Directors of Central Missouri Community Credit Union on the proposed revisions to Part 704.

Although this regulation will not affect our credit union directly, we feel it will affect a large number of small to medium natural person credit unions like us and depend upon the services offered by their corporate. We have many concerns over some portions of the proposed regulation.

While we believe there should be minimum capital requirements, expecting corporates to achieve these goals within one year is very unrealistic. We see money leaving the corporate system at a very fast pace if this requirement is not expanded to at least a three year goal. Another way for corporates to achieve this goal would be to reduce the spread on investments to credit unions investing with corporates forcing us to go outside the credit union network to invest thereby increasing our costs. If our corporate should have to reduce services or increase fees on other services offered in order to achieve this capital goal, it could again have a serious effect on our bottom line as well. We in turn would be forced to look outside the corporate network for some of our operational services, which would increase our costs and affecting what we could do for our members.

We also have concerns with the director term limits; we feel that nine years maximum would be a much better length. You are utilizing that expertise a little longer and could still have a good rotation of members.

Please take time to re-evaluate the proposed new regulations carefully to ensure the continued support and services that corporates give to the majority of natural person credit unions. It is vital that this system be saved to ensure that credit unions like ours survive for the people.

Sincerely,

Carol White

Carol White
President/CEO

Michael Ash

Dr. Michael Ash
Board Chairman

K. Parker McNeel

K. Parker McNeel
Board Vice Chairman

Jake Donovan

Jake Donovan
Board Treasurer

Bob Bartlett

Bob Bartlett
Board Secretary

George Thomlinson

George Thomlinson
Board Member

Phyllis Domann

Phyllis Domann
Board Member

Jim Hargrave by SC

Jim Hargrave
Board Member

Warrensburg

201 S. Holden • Warrensburg, MO 64093
(660) 747-3311 • Fax: (660) 747-2800

Sedalia

3120 W. 10th St. • Sedalia, MO 65301
(660) 826-6922 • Fax: (660) 826-2078

Richmond

920 Stonner • Richmond, MO 64085
(816) 776-5593 • Fax: (816) 776-3065

1767