



March 5, 2010

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

RE: Proposed Changes to NCUA Regulation 704

Dear Ms. Rupp,

I am a full-time employee of Peoples Choice Federal Credit Union in Lincoln Nebraska, which has been serving its membership since 1949. My credit union is a \$60 million organization that serves approximately 13,000 members and is a member of SunCorp Federal Credit Union.

I am writing you today to address a couple issues I have with the proposed rewrite of NCUA Regulation 704. It is my belief that a number of the proposed changes in Regulation 704 will negatively impact SunCorp and ultimately have a trickle down effect on my credit union.

From my perspective, SunCorp has provided the credit union with essential no-cost staff training on topics such as; BSA and OFAC compliance, ACH compliance and audit review, funds transfer security, check conversion, branch capture options, in addition to training needed to meet regulatory requirements. Without the assistance of our corporate office, the credit union would be forced to look elsewhere in the marketplace for practical cost effective training alternatives.

In addition to training support, SunCorp also provides products and services that the credit union utilizes on a daily basis. Credit unions of our size would not be a viable option for our membership without the automatic clearing house, wire processing, daily cash and investment options that our corporate office provides. Without these and other products and services, the credit union is put at a competitive disadvantage and would likely have additional operations expense by outsourcing these products or services to large for-profit financial institutions.

In my opinion, these are just a couple examples that would impact our bottom line and ultimately be detrimental to the credit union system as a whole.

Thank you for your time and consideration on this important matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Kory Kramer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kory A. Kramer

Peoples Choice Federal Credit Union

CC: Senator Mike Johanns, Nebraska
Senator Ben Nelson, Nebraska
Representative Jeff Fortenberry