

March 7, 2010

Mary Rupp, Secretary Of the Board

National Credit Union Administration

1775 Duke Street

Alexandria, Va. 22314

Dear NCUA Board Members:

I am a long standing member of Summit Credit Union and am currently serving as vice-chairman of the board of directors. We at summit and most all credit unions rely on the many services offered through corporate credit unions. The health and welfare of the corporate credit union system is of vital concern. The proposed regulation Part 704, as currently drafted, could lead to the demise of the corporate credit union system.

I have several concerns regarding the current proposal. I will focus only on four:

1. The cash flow mismatch limitation that would match the cash flows of assets and liabilities will seriously impede corporates ability to generate adequate earnings. As written, this rule will not allow corporates to comply with retained earnings requirements.
2. Corporate credit union "Legacy" assets must be isolated in order to facilitate recapitalization.
3. While I am not opposed to term limits for corporate board of directors, six years does not appear to be optimum. Three classes serving a maximum of three terms for a total of nine years should provide for more cohesive governance over the long haul. I do feel that the corporate board chairman should serve no more than three years without a break. The corporate board should be made up of natural credit union executives and serve without compensation from the corporate. Should the NCUA board in its infinite wisdom deem it absolutely essential that outside talent be integrated into the corporate board structure, that position should limited to no more than 20% of the total board. Further, I find no viable reason to prohibit corporate boards from including credit union association executives.

4. If I read the proposed part 704 correctly, many of its provisions become effective upon implementation. What is the hurry? The system did not get into its current condition overnight and "the listing ship will not be righted overnight. Why place corporates in a position of non compliance overnight? Timely systematic implementation should be in the best interest of all parties.

The banking industry must be salivating while waiting around the corner for the corporate system to implode. The NCUA board must not let this happen. We are "eye witness" to a very important time in the history of our good and noble industry. Be and act as smart as you are, think outside the box, and do the right thing for countless consumers who rely on a viable credit union system. A lot of people are depending on you!

Respectfully,

Curtis J. Ring