



March 8, 2010

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

Subject: Comments on Part 704 Corporate Credit Unions

Dear Ms. Rupp:

Thank you for giving credit unions the opportunity to comment on the proposed changes to the corporate credit union rules. Dow Great Western Credit Union is a small credit union (\$37 Million) with limited resources and we rely heavily on the products, services and assistance that our local corporate, Wescorp, provides for us and we ***depend on our corporate credit union to help us serve our credit union members.***

Very simply put, my credit union needs Wescorp now and in the future to provide reasonably priced payment systems for us! If my credit union is forced to go elsewhere, such as to a bank, my expenses will rise, which will put further strain on our ability to provide low cost products and services to our members. This proposed rule will hurt small credit unions and may ultimately drive us out of business.

While we are willing to help recapitalize Wescorp at some point and in some manner, doing so in the short timeframe detailed in the proposed rule changes will incur further financial strain on our credit union financials and would be extremely onerous to my Board of Directors already frustrated with the depletion of our Member Capital and Paid in Capital losses from NCUA's actions.

We also rely on Wescorp for a portion of our shorter investments and would like to see that service (Part 703) continued.

We have also utilized Wescorp's loan participation services (managing our own due diligence with appropriate care) and that program has also been successful in increasing our earnings capability. We hope that the new rules will allow Wescorp to resume this service for small credit unions in the future.

I seriously ask you and the rest of the NCUA Board to consider the implications these rule changes will have on small and mid-sized credit unions before the rules are implemented.

Sincerely,

A handwritten signature in black ink, appearing to read "Bonni Bergstrom", with a long horizontal line extending to the right.

Bonni Bergstrom
President/CEO
Dow Great Western Credit Union
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Antioch, CA 94531