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**Subject:** Comments on Part 704 Corporate Credit Unions  
**Date:** Monday, March 08, 2010 7:20:38 PM

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Date: 03/08/2010

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

Subject: Comments on Part 704 Corporate Credit Unions

Dear Ms. Rupp:

On behalf of Inland Valley Federal, I appreciate the opportunity to comment on NCUA's proposed amendments to Part 704, which would make major revisions regarding corporate credit union capital, investments, asset-liability management, governance, and credit union service organization (CUSO) activities.

As Chairman of the Board of Inland Valley Federal Credit Union (IVFCU) I wish to express my concerns over some of the critical proposed regulatory items found in NCUA Regulation 12 CFR, Part 704.

While I commend the objective of this regulation, I am concerned that some short-sighted elements might actually be a detriment to our Credit Union rather than ensure long-term sustainability and security.

The crux of my concerns center around some of the restrictions and more critically, how they could restrict our ability to partner with WesCorp in providing our members with the type of services and expertise they have come to expect. In specific terms, here is what concerns all of us at IVFCU:

- ? Remove penalty for early withdrawals on corporate certificates [704.8(c)]
- ? Revise Net Economic Value (NEV) sensitivity analyses to allow WesCorp to earn sufficient income and retained earnings [704.8(d), (e) & (f)]
- ? Extend weighted average asset life expectations to accommodate both short and long term needs [704.8(h)]
- ? Adjust concentration limits sufficient to allow WesCorp to invest short term liquidity at reasonable rates [704.6(c) & (d)]
- ? Require only truly senior executives and directors to disclose compensation [704.19]
- ? Expand overall limits on business generated from individual credit unions to allow WesCorp to provide reasonably priced short-term liquidity [704.8(k)]
- ? Ensure that WesCorp can find qualified CUSO partners without having the regulations impede that objective [704.11]
- ? Have an independent third party review the retained earnings growth model identified in section [III.D]

I appreciate the NCUA's efforts and am hoping that my concerns will merit sufficient consideration before the final regulation is implemented.

Respectfully,

Christopher J. Krueger  
Chairman of the Board  
Inland Valley Federal Credit Union

Thank your for your consideration to this critical matter.

Sincerely,

Christopher Krueger