

March 8, 2010

To: National Credit Union Administration

Fr: James Spafford

Re: Proposed Corporate Regulations

Dear NCUA:

I am writing in response to the proposed corporate credit union regulations. I am concerned that the proposed regulations would create a heavy burden on the Corporate Credit Unions as well as our individual credit unions.

I do not consider consolidations of the Corporate Credit Unions as the best alternative to solve our current issues. Bigger is not always better. I believe that we need to focus on a more effective and specific investment policy for Corporate Credit Unions in the future. We need to manage and regulate risk more effectively in specific investment portfolios.

Missouri Corporate Credit Union is a smaller Corporate Credit Union compared to others. Missouri Corporate was well capitalized and effectively managed for their member credit unions. In addition, Missouri Corporate Credit Union has given an excellent level of personal service to our credit union. The proposed regulations will hurt our relationship with Missouri Corporate Credit Union.

Under the proposed regulations, Missouri Corporate Credit Union will have an extremely difficult task of meeting the proposed capital standards. These proposed standards seem nearly impossible to achieve for Missouri Corporate Credit Union. In an attempt to meet these requirements, Missouri Corporate Credit Union will have to raise capital, cut expenses, reduce services and pay less on investment offerings. These actions will hurt our credit union financially as well as other member credit unions of Missouri Corporate Credit Union.

I am asking you to reconsider the proposed regulations for our Corporate Credit Unions. I think additional time is required to consider other possible alternatives to help our Corporate Credit Unions and individual credit unions. Thank you for your consideration.

Sincerely,

James A. Spafford
President
Postal & Community Credit Union