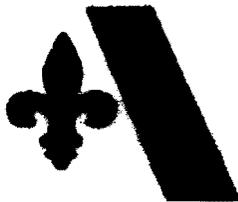


FROM :Acadian FCU

FAX NO. :3372334874

Mar. 08 2010 03:12PM P2



Acadian Federal credit • union

102 SUNBEAM LANE • LAFAYETTE, LA 70508
(337) 233-6744 • FAX (337) 233-4874
www.acadianfcu.org

March 8, 2010

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

Re: Proposed Corporate Credit Union Regulation 704

Dear Ms. Rupp:

On behalf of the management and Board of Acadian Federal Credit Union, thank you for the opportunity to comment on the proposed corporate credit union Regulations 704.

Acadian Federal Credit Union is \$14.6 million in assets, has around 3100 members and serves 42 company groups. We are members of Louisiana Corporate Credit Union and Southwest Corporate Credit Union.

We believe there are some beneficial changes, the proposed rule contains several changes which, left unchanged in the final rule, will significantly limit the value that corporates will be able to provide and therefore are not in the best interest of the credit union system. These changes will threaten the credit union system by limiting the availability of lines of credit to NPCU's, increasing the cost of correspondent services, and threatening the smooth operation of payment and settlement systems in the post-regulation implementation period.

The stated objective for limiting deposits from any one source to no more than ten percent of a corporate's assets is to reduce risks that arise from placing undue reliance on a single entity. However, by limiting funds from any one source to no greater than ten percent of a corporate's assets, the proposed regulations would force funds out of the credit unions system. It would penalize corporates that have acted responsibly with their members' money and it would deny credit unions our ability to invest in institutions we would deem appropriate. And it would force NPCU's to look at other alternative vendors for services.

If this limit is imposed, the likely scenario going forward is that we and other credit unions will withdraw funds from the system. This could lead to decreased liquidity in the system that could result in the restriction of credit some credit unions would otherwise provide to our members.

Thank you for providing us with the opportunity to respond to the proposed regulation.

Sincerely,

A handwritten signature in black ink that reads "Sandra C. Williams".

Sandra C. Williams
CEO

1427