

**From:** [Tom Young](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Comments on Part 704 Corporate Credit Unions  
**Date:** Monday, March 08, 2010 9:49:54 AM

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Dear NCUA Board and Staff,

Rather than try to reiterate a response, please acknowledge that we are in full agreement with Corporate Central Credit Union's response issued by our President Robert Fouch. As you are well aware, Corporate Central has and will continue to be one of the few success stories in the Corporate movement and the proposed regulations limits our ability to move forward in many areas, especially the area of continuing to make long term loans to its member credit unions. In many cases, NCUA has overstepped its authority by imposing themselves with arbitrary decision making, which only leads to more ambiguity and confusion. If you are going to impose a regulation, then make it so. There should be no room left for arbitrary decisions made by a regulator. This is especially apparent under the Reservation of Authority section and the uncertainty relating to capital calculations. This ambiguity again raises its ugly head under the Prompt Corrective Action section. There should be no question left to anyone as to what is required of a corporate, nor should one category of weakness prompt a PCA and change or modify the capital requirement.

On a personal note, I am a 30 year veteran of Credit Union's, and also the longest tenured Board member of Corporate Central Credit Union at 14 years. I have no problem with term limits, although I believe that should be left up to the individual corporates. It currently takes eight years just to go through our rotation of board positions, so I believe 9 years should be the minimum, but 12 years would be ideal. Six years would have a devastating effect on the smooth transition, education, and history involved in running a corporate.

Very sincerely,

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