

**From:** [Patti Seymore](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [Steve Harkins](#)  
**Subject:** Reg 704  
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Thank you for the opportunity to comment on the proposed changes to NCUA Regulation 704. The need to change regulations after last year's problems in the corporate system is clear. I applaud NCUA for the many changes within the proposed regulation that will improve the safety of the system, however, it is my feeling that the proposed corporate regulation is so narrowly written that the corporate business model becomes unsustainable. The proposed regulation goes too far in removing risk from the balance sheet.

Our credit union is very dependent on our corporate, First Carolina. Like most credit union executives across the country, I am concerned about the prospects of being forced to a bank or broker if the credit union corporate system does not survive after new regulations are enacted.

I would like to ask the NCUA Board to reconsider the regulation and allow Corporates to maintain a business model that operates safely while continuing to deliver value to the members.

I thank you again for the opportunity to address this issue.

Kind regards,

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*Insanity - doing the same thing in the same way and expecting a different outcome*

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