

From: [Doug Thompson](#)
To: [Regulatory Comments](#)
Subject: Douglas Thompson comments on Part 704 Corporate Credit Unions
Date: Tuesday, March 09, 2010 5:41:55 PM

Dear NCUA, I firmly believe that the Corporate Credit Union System is important to the entire Credit Union Movement! Changes need to be made that will protect against repeating some of the problems of the past, but there must also be some latitude given! The following changes should be considered: Drop the average life requirement while maintaining the 300 basis point credit shock test. Also provide credit for core deposits in the credit shock test. I also firmly believe that the legacy assets must be addressed when you are determining what direction to go with Corporates! Once the legacy asset problem is addressed, natural person credit unions can make a more clear assessment of the Corporate structure. I believe that these issues must be addressed to allow the corporate structure to remain a viable option for natural person credit unions to invest in. I make the assumption that capital will be required at some point in time. After losing the majority of our capital to this point, we must be assured that the corporate have a chance to succeed! Thank you for your time and consideration! I know it is a tough problem to solve, but I know it can be done! I believe the corporate situation is bigger than just the corporate! I believe that the entire credit union movement hinges on how we pull together, or if we do, to face this issue. If we all go our separate ways, the movement would appear to be no different than the banking industry! Then I think we have paved the way for 1 super regulator and all financial systems will be the same. Our members would certainly suffer if that was to happen. Credit Unions need to remain a viable option for financial transaction!