

From: [Denny Robertson](#)
To: [Regulatory Comments](#)
Subject: regulatory comments
Date: Thursday, December 16, 2010 2:00:04 PM

Mary Rupp, Secretary of the Board December 16,2010

VIA E-mail to: regcomments@ncua.gov

National Credit Union Administration

1775 Duke Street Alexandria, VA 22314-3428

Re: Proposed Regulation 12 CFR Part 701, 704, 741

Dear Ms. Rupp,

Cheerful good holidays.

This letter is a response to proposed changes to these NCUA Regulations.

In general, the level of self-examination undertaken by our SUNCORP Corporate Credit Union under the blazing scrutiny of the NCUA has been admirable and well documented to its members. Ours is a very small credit union, but as SUNCORP communications have improved throughout this crisis, our Board has found them illuminating and quite comprehensible.

Certainly tighter NCUA regulation of our corporate credit unions was necessary particularly in the area of investments. Through your great exertion, it appears better regulation has now been enacted to the satisfaction of this member credit union. We are all watching SUNCORP much more closely.

Within my understanding, I believe additional and expanded changes now proposed for the NCUA Regulations cited above are premature, excessive, and will cause considerable, unnecessary expense to be passed along to SUNCORP's member credit unions.

Regulatory compliance is only one important part of the business of SUNCORP. We at the member credit unions feel SUNCORP's product/service development, security enhancements, and tight budget management are just as critical for our collaborative success in 2011 and beyond.

Please do not enact any further regulation while their compliance staff is on target to respond to the current raft of new regulations they face. Please let their currently-budgeted staff meet the challenges already in place without forcing them to staff-up any further for compliance purposes. Thank you.

Sincerely,
Dennis Robertson, Manager
Ashoka Credit Union
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