

2969 Smith Road  
Fairlawn, Ohio 44333



645 North Main Street  
Akron, Ohio 44310

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

Re: Assessment of non FICUs for the Corporate Credit Union Stabilization Fund:

Dear Ms. Rupp:

I have one basic question, would NCUA instruct its federally insured credit unions to "voluntarily or otherwise" help our private insurance provider pay for losses it has sustained? Let me take that a bit further, suppose those losses were partly attributable to the insurance companies' slow to react examiners as was the case determined by your own Inspector General's report.

It seems to me that NCUA has no downside if it should prevail in this action; it could produce considerable revenue (approximately \$9M in the first year alone but still only about one third of your 2011 budget increase), possibly eliminate the only remaining competition for deposit insurance, and likely cause some state chartered Credit Unions to convert to a federal charter or merge out of existence.

Our insurance provider has advised us that NCUA has no standing to do any of this. But you do have almost infinite control over every federal credit union and to a somewhat lesser extent any state chartered credit union with federal insurance. This heavy-handed tactic will surely produce challenges in the court system which will serve none of us well and diminish the credit union industry in the eyes of our members and non members alike, not to mention the expense. Bankers will most certainly be your most vocal supporters.

One final observation, recently our President announced pay freezes for most federal employees. How does NCUA not fall under that mandate?

It would absolutely amaze me if anybody there at this government agency could be bothered with spending a few minutes to answer my questions. For after all you are a government agency and as such I thought you were supposed to work for us tax payers.

Respectfully,

A handwritten signature in black ink, appearing to read "Alan McArthur".

Alan McArthur  
CEO of a privately insured Credit Union  
December 16, 2010