



December 21, 2010

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

Re: Notice of Proposed Rulemaking for Part 704 – Corporate Credit Unions

Dear Ms. Rupp:

I am writing on behalf of Akron Firefighters Credit Union, who has been privately insured through American Share Insurance of Dublin, Ohio for over 40 years. After reading the proposed amendments to Part 704, I am very concerned regarding your agency's attempt to seek voluntary contributions from non-federally insured credit unions to the Temporary Corporate Credit Union Stabilization Fund.

Federal law requires privately insured credit unions disclose that they are not backed by the full faith and credit of the US government. With this disclosure comes a perception, by many, as an indication that privately insured credit unions are not as safe and sound as federally insured credit unions. As a result, the credit has to spend additional dollars in marketing and member education to dispel this misconception. We do not enjoy the same benefits that federal insurance carries, thus, we should not be required to pay for losses sustained by an agency of the US government. Additionally, as an investor in a corporate credit union, our credit union should have the same rights to participation and membership as any other participating credit union, and should not be subject to expulsion simply for failure to make a voluntary contribution.

I appreciate the opportunity to express my comments on the proposed changes.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Linda Williams", is written over the typed name.

Linda Williams, CEO  
Akron Firefighters Credit Union