



friendly, flexible, professional  
...Bank On It!

December 27, 2010

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

Re: Response to Proposed Amendments for Part 704 – Corporate Credit Unions

Dear Ms. Rupp:

I am the President and Chief Executive Officer of Cardinal Community Credit Union, a state-chartered, privately insured credit union in Northeast Ohio ("Cardinal"). Cardinal is the sixth largest credit union in Ohio with assets of approximately \$154 million. I write this letter to advise you of my grave concern regarding your agency's proposed amendments to the final corporate credit union rules posted in the Federal Register on November 29, 2010, and strong objection to such amendments.

Your agency's attempt to require privately insured credit unions such as Cardinal, to pay fees to the Temporary Corporate Credit Union Stabilization Fund is, in our view, both outrageous and illegal. Our members chose not to be insured by the federal government through the NCUA, and instead chose to be privately insured by American Share Insurance ("ASI"). As such, we are neither entitled to financial support from the federal government, nor are we responsible for poor lending decisions by institutions that chose the NCUA over ASI. As you know, ASI does not insure corporate credit unions. Your proposal to require Cardinal and other privately insured credit unions to pay a "voluntary contribution" is nothing more than a mandatory "bail out" of your fund.

What is particularly disturbing is the method by which your agency is attempting to achieve this bail out. Privately insured credit unions have no contractual relationship with the NCUA, nor are they required under their respective state statutes to cover any share of federal insurance losses. Accordingly, the NCUA has no regulatory or contractual authority over privately insured institutions. Your attempt to circumvent this fact through regulatory rulemaking is but one more reason why our members, and the public at large, are fed up with the way that Washington D.C. operates.

Thank you for your consideration to this very important matter. I hope your agency will reconsider the amendments as proposed.

Respectfully submitted,

A handwritten signature in cursive script that reads "Christine Blake".

Christine M. Blake  
President/CEO

Cc: Board of Directors