



December 27, 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 President/CEO of Blackhawk Area Credit Union in Savanna, IL. BACU is a state-chartered, privately-insured credit union, which serves approximately 5,400 members and currently has 28.5 million in assets. My board of directors and I are totally against the proposed regulations under Part 704. We do not understand how NCUA can attempt to get around federal law by rulemaking.

NCUA has no regulatory control over our credit union, nor do they insure the deposits of our credit union. You have no legal right to require a "voluntary contribution" from credit unions insured privately through American Share Insurance (ASI) for losses that occurred in your fund. What's even more shocking is the fact that NCUA plans to have non-federally insured credit unions expelled from a corporate credit union unless they pay the required "voluntary contribution".

We value the relationship we have with our corporate credit union and we are very dependent on the services they provide. I hope the Board of NCUA will reconsider the amendments as proposed.

Respectfully submitted,

A handwritten signature in black ink that reads "Rhonda Schroeder". The signature is written in a cursive, flowing style.

Rhonda Schroeder  
President/CEO

