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December 29, 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 E.S.A. Credit Union, state chartered in 1940, who has been privately insured through American Share Insurance since 1983. After hearing about the proposed amendments to Part 704, I am concerned regarding your agency's attempt to seek 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, and they receive no direct benefit from NCUA, the TCCUSF or the federal government. Accordingly, I am confused as to why the NCUA believes privately insured Credit Union's should be required to pay for losses sustained by an agency of the US government. As an investor in a corporate credit union, our credit union should have the same rights to membership as any other credit union, and should not be subject to expulsion simply for failure to make a voluntary contribution. I still don't believe it was right to force us to write down the funds we had invested in our Capital account at Wescorp either.

We are in the process of seeking alternatives to Western Bridge Corporate Credit Union. We would love to stay in the corporate system as it has done us well over the years. However we will probably end up doing business with a local bank if the costs warrant. We will not spend thousands of dollars for the same service a bank can offer at a more reasonable and cost effective price.

Sincerely,

Loyal Perry III
Manager
ESA Credit Union