



January 3, 2011

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:

As the President/CEO of Abri Credit Union, a privately-insured credit union located in Romeoville, Illinois, I would like to voice my strong opposition to the NCUA's proposed amendment that will nearly force us, as well as other non-federally insured credit unions, to help pay for the NCUA's losses in the five conserved corporate credit unions.

As a privately insured institution, our credit union is not under the regulatory control of the NCUA, nor are our deposits insured by this federal agency. Federal law requires that privately insured credit unions disclose that they are not backed by the full faith and credit of the US government and that they receive no direct benefit from the NCUA, the TCCUSF or the federal government. Accordingly, I am confused as to why the NCUA believes non-FICUs should be required to pay for losses sustained by an agency of the US government.

This attempt by the NCUA to extract funds from privately insured credit unions to pay for the corporate losses is, in my opinion, a case of this federal agency stepping out of its legal boundaries. By doing this, the NCUA is effectively taxing non-federally insured credit unions by requiring this "voluntary contribution" be paid to the TCCUSF. The potential for legal proceedings and legal expenses looms over the horizon and should be avoided altogether by removing this unreasonable requirement from the final amendments to the proposed corporate rules.

Since our credit union depends on the services from our corporate credit union and we value our relationship with them, we certainly hope your agency will reconsider the amendments as proposed.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Brian Cedergren", is written over a horizontal line.

Brian Cedergren  
President/CEO  
Abri Credit Union

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