



JAMES C. MILES
President & CEO

January 3, 2011

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

Dear Ms. Rupp:

I am writing on behalf of MidUSA Credit union, a privately-insured credit union serving over 18,000 members in the State of Ohio, in opposition to the amendments the NCUA adopted on November 18, 2010 regarding privately insured credit unions "voluntary contributions" to the Temporary Corporate Credit Union Stabilization Fund.

Since federal law clearly instructs the NCUA to charge only federally insured credit unions any assessments that are due to the TCCUSF, the assessment would not only be a violation of Section 217(d) of the Helping Families Save Their Homes Act of 2009 (S.896), which is responsible for creating the TCCUSF, to require a non-federally insured credit union to do the same would seem unconscionable considering we have no contractual relationship with the NCUA.

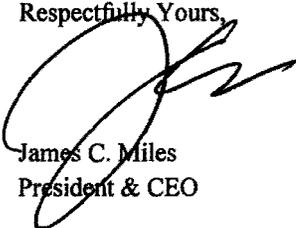
A non-federally insured credit union is under no contractual or statutory obligation to pay such assessments to the NCUA. Requiring a privately insured credit union to pay assessments for the next 11 years, would be similar to the FDIC requiring a federally insured credit union to pay premiums to them. Likewise, while you are asking privately-insured credit unions to "voluntarily contribute" to the TCCUSF, MidUSA could never recover the premiums paid into this program over the next 11 years, because we have no rights to future dividends, as does a federally insured credit union.

As you know, as a privately insured credit union, we are required to disclose that we are "*not* backed by the full faith and credit of the US government" (12 USC 1831t), so then, it would not seem reasonable that a non-government entity should be required to contribute to a fund that has sustained losses by an agency of the US government.

In addition, it does not seem reasonable for a non-federally insured credit union that has and will continue to honor its membership agreement with its corporate credit union, in our case Corporate One, to be expelled for failing to make a "voluntary contribution" to a federal entity that it has no legal affiliation with or responsibility to pay.

As hopefully you can see, it seems inappropriate for a non-federally insured credit union to be contributing to the losses that were sustained by a federal entity.

Respectfully Yours,


James C. Miles
President & CEO

MidUSA Credit Union, Inc.

3600 Towne Boulevard
Middletown, Ohio 45005

(513) 420-5804

www.midusacu.org

1201 Crawford Street
Middletown, Ohio 45044

6752 Cincinnati-Dayton Rd Suite 101
Liberty Township, Ohio 45044

Fax (513) 420-5901

933 West State Street
Trenton, Ohio 45067

jmiles@midusacu.com

21 West Dorothy Lane
Kettering, OH 45429

(800) 633-8905

1162