



Bluffton Motor Works / Franklin Electric Employees' Credit Union

410 East Spring St. • Bluffton, IN 46714 • (260) 827-2213

January 19, 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:

I am writing on behalf of Bluffton Motor Works / Franklin Electric Employees Credit Union, serving our members in the state of Indiana.

This credit union was shocked when reading your agency's proposed changes in 704.21 regarding the *Equitable Distribution of Corporate Credit Union Stabilization Expenses*. What most amazed us was the very concept of your federal agency attempting to; basically, extort funds from us by asking a third party to take the action of "expelling" us from a corporate credit union. This credit union is confident that you have no legal right to attempt to charge us via a "voluntary payment" for losses that occurred in your fund and not our fund with American Share Insurance (ASI). We make it well-known that we are not backed by the full faith and credit of the US government as required by law. So why would we help pay for losses sustained by an agency of the US government that doesn't insure this credit union if it fails financially? I feel that you would not agree should ASI be in a similar position! As you are probably aware, we are paying special premiums to ASI for private insurance with them to protect our members since we are not a federal credit union.

Please share our credit union's objection with your Board and chairman. It would be greatly appreciated.

Respectfully,

Kathryn L. Durham, Manager
Bluffton Motor Works / Franklin Electric Employees Credit Union