

*Saint Alphonsus*  *Medical*  
**CREDIT UNION**

FEB01'11 PM 1:38 BOARD ✓

January 24, 2011

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:

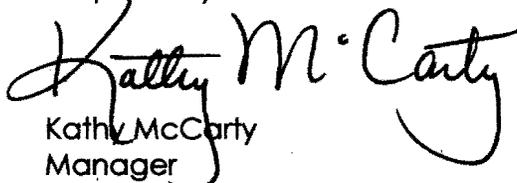
On behalf of myself and the board of directors of St. Alphonsus Medical Credit Union in Boise, Idaho, serving over 1,850 members, I am making our comments known regarding your agency's proposal to charge privately insured credit unions for losses in the federal insurance fund (TCCUSF). For many years we have been insured by American Share Insurance (ASI) and we are **required** to prominently advise our members that we receive no benefit from the federal government.

For the past 24 months the corporate credit union failure has negatively impacted not only our bottom line, but virtually almost all the other 7,500 credit unions in our country. Over the past two calendar years, ASI has imposed two premium assessments of their own to help offset claims and reserves in their fund and **we have already incurred significant financial pains** – and now you are proposing future "voluntary premiums" for us and other non-federally insured entities.

**We have received no assistance or benefits from your federal agency** and feel that, as a result, the NCUSIF and the TCCUSF has no right to expect us to pay any billed amounts. Since our credit union has always availed ourselves of corporate credit union services, to have us expelled would negatively impact our corporate – and we would have to seek their services from other financial institutions, likely at a higher cost to us! **No one wins in this game – our credit union, our corporate credit union, or most importantly our members.**

In closing our board feels that you have no contractual right to expect non-federally insured credit unions to pay any billed amount, regardless of what you call it.

Respectfully,

  
Kathy McCarty  
Manager