

This could cause negative economic and service related consequences to our credit union.

Section 704.23

Proposed Section 704.23 would permit corporate credit unions to charge member credit unions, as a mandatory requirement of membership, a reasonable one-time or periodic membership fees. I believe if a corporate credit union is managed well, and NCUA is has proper oversight, a corporate should not be in the position of needing to assess additional fees on member credit unions. The fees would also put an additional burden on credit unions that are already struggling. The result could end up driving more credit unions away from their corporate credit unions, thereby eventually weakening the entire corporate credit union system.

Staley Credit Union places a very high value on the services we receive from our primary corporate, Members United Bridge Corporate Federal Credit Union. The fragmentation of the credit union framework resulting from the fallout from your ill-conceived proposals will likely be devastating to the credit union industry.

Thank you for allowing us to comment on the proposed additions to the new corporate credit union regulation.

Respectfully,


Larry E. Preston, CCUE
Vice President Operations