

**From:** [Chris Owen](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Proposed Prepayment of Assessments - COmments  
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From Christopher Owen, CEO at Meriwest CU, \$1B

First of all, thank you for proposing the assessment prepayment program. It comes at an opportune time as we all seek to navigate through an uneven economic recovery. If implemented it will help all, and Meriwest intends to commit to the maximum prepayment amount.

Secondly, in the spirit of trying to improve the offering so that as many as possible will want to commit to its success, we offer some suggestions:

1. To abate the "free rider" issue, increase the minimum for implementation from \$300M to at least \$1B in order to produce the early expense savings necessary as more incentive for those on the fence.
2. Make the minimum participation 10 bp not \$10,000. You will have so much more acceptance by including all CUs & a real chance at selling this as "we are all in it together".
3. Apply prepays fully to assessment reduction. The notion you may be saving part for liquidity will poison the well for sure!
4. Pay something as interest for the "loan". It will diminish the free loan sound bites...

Anyway, good luck with it all and we support the effort.