

From: [Regulatory Comments](#)
To: [Board Mail](#)
Subject: FW: Larry Roland - Comments on Potential Voluntary Prepaid Assessments Program
Date: Wednesday, June 15, 2011 11:09:45 AM

Dear NCUA Board,

I believe the "Temporary Corporate Credit Union Stabilization Fund Assessment" plan you are considering has little incentive and little hope of succeeding, but if you consider the plan outlined below you might be pleasantly surprised by the general response of the Credit Union industry

- The key to the success of my suggestion would be that it is a one time charge we expense this year, or better yet do a prior year adjustment reflecting our paid obligation. The Credit Unions that do not have the capital to afford such a transaction can continue with the 11 year plan.
- I realize this may be atypical for accounting standards, but if the NCUA puts their influence behind this suggestion I feel the accounting industry would make this case an exception.
- If, and it is a big IF, the mortgage market regains its footing and reduces the exposure to losses on the toxic mortgage backed securities you now hold, then you can return to the Credit Unions that chose to be fiscally responsible to pay their debt today in lieu burdening the future managers and Board of Directors for the sins of yesterday. the unused funds as income.
- It is my belief that through time our Credit Union is going to be assessed more assuming we grow, and that there will be fewer Credit Unions around to foot the bill.

Thank you for you attention,
Regards,
Lawrence G. Roland,
President
ECU Credit Union