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August 15, 2011

Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Ms. Rupp:

I am writing in response to the NCUA's proposed rulemaking for CUSO Regulation. I oppose regulations that do not create unique and industry specific value. They are simply redundant and unnecessary. A request for power should be accompanied by a full plan that discloses both the need for power and the intention of its use.

CUSOs help credit unions earn and save millions of dollars under the current regulatory model. There is no evidence that CUSOs pose a systematic risk to credit unions that requires regulatory change.

NCUA's information disclosure and regulation of CUSOs will stifle the ability of CUSOs to innovate and provide collaborative solutions that will sustain credit unions as regulatory considerations will often replace value factors in the decision to invest in a CUSO. There is no recognizable regulatory value beyond what already exists.

By imposing regulatory burdens on them, CUSOs are put at a competitive disadvantage with non-CUSO competitors by exposing private business secrets to public dissemination through FOIA requests. CUSOs are the collaborative arm of credit unions trying to solve operational and financial issues for credit unions. Credit unions should not have unnecessary hurdles placed in their path as they seek solutions to their sustainability by the very agency that should champion their existence.

Please reconsider the need, the value and the burden of this proposal.

Sincerely,

A handwritten signature in cursive script that reads "Kevin Finneran".

Kevin Finneran
Community Driven Credit Union CEO/President

Cc: Dave Adams, MCUL CEO
Jack Antonini, NACUSO CEO

