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**Services Center Federal Credit Union
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David J. Wright, CEO
September 16th, 2011**

Ms. Mary Rupp, Secretary
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

SEP20'11 PM 3:32 BOARD

Dear Ms. Rupp

The following will serve as comments from my credit union regarding NCUA's proposed amendments regarding CUSOs.

I make these comments as I personally serve on the Board of Directors of CU*Answers, out of Grand Rapids, Michigan. I also make these comments as our Credit Union is about to form a CUSO that will provide disaster recovery solutions to credit unions and other CUSOs. Our Credit Union is also an owner/collaborator with two other CUSOs, Xtend, and Dakota Financial Services.

Sitting on the Board of Directors of CU*Answers for over 10 years I have personally witnessed the growth of this CUSO, not just in the number of credit unions that we serve, but in the array of needed services that we provide to our clients. The services that CU*Answers provides, help our clients navigate the difficult terrain that credit unions are facing in this day and age.

Let me give you just a few examples. First, CU*Answers provide a bookkeeping service to our clients. We do so with NO long term contracts. We have literally had clients call us and say that "Mary is sick and we need someone to balance the books each day". We have then taken over balancing their books on a day-to-day basis until Mary comes back to work. We will even do the daily book work while an employee is on vacation, again with no long term contract.

CU*Answers provides a service called AUDIT Link. This unique service offers clients help with compliance issues. For a reasonable

fee, Audit Link will go a credit union and review their policies and procures for compliance with the myriad of laws and regulations facing credit unions today. Audit Link will also provide a daily service that will monitor key financial records for compliance. Does audit link replace the credit union's responsibility for compliance? Absolutely not! But they do assist and I believe improve the credit union's capability to comply with laws and regulations and thereby reduce the exposure that they might pose for noncompliance.

As I said these are two of the dozens and dozens of services that CU*Answers provides to our clients on a daily basis. No credit union exists today that could provide all these services on their own. But by collaboration, our clients are providing for the long term viability of not just themselves but for credit unions as a whole.

Now, Services Center Federal Credit Union is poised to form a CUSO, SITE-FOUR, that will provide disaster recovery solutions to credit unions and CUSOs and provide data processing solutions to credit unions. Our Credit Union has been a self processor for over 20 years. We believe we are good at being a self processor. But, we would be the first to admit that self processing isn't for everyone. It requires specialized employees and facilities that are above and beyond what might be considered "normal". We have the specialized employees. We have a primary site and a backup site that are way above and beyond "normal". Quite frankly it would be selfish of us not to offer our facilities and our employees to help out other credit unions.

I have told you all this so that you can get some background on the reasons that I feel the way that I do.

I believe that most CUSOs can be expressed in a formula. $1 + 1 \Rightarrow 2$. One plus one equal a number greater than 2. When credit unions form a CUSO and they collaborate, and the results of their efforts are more than any one credit union could achieve on their own. And quite frankly the more credit unions that participate the greater the end result. I would submit to you that NCUA should encourage the growth of CUSOs.

NCUA is now at a crossroads. Do you pass more rules and regulations? Do you rule with an iron fist or kid gloves? Do you regulate with the authority you already have? Do you discourage CUSO formation and operation? I would propose that you regulate

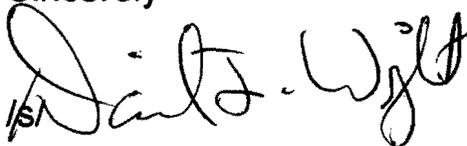
with the tools that you already have in your arsenal. Be proactive and stop the bad activities, but also promote and encourage the CUSOs that are providing and contributing to the financial well being of credit unions all across America.

There have been some losses resulting from CUSOs that were not run properly. I believe in the cases where there have been losses resulting from improperly run CUSOs the NCUA already possesses the needed authority to stop these losses. If one didn't know better one might think that NCUA was seeking new authorities over CUSOs just to cover up the fact that they were asleep at the wheel when these CUSO losses occurred and that NCUA had authority to stop or minimize those losses. I continue to hope that NCUA only has the best of intentions however.

I believe that NCUA will look at this situation as a whole and realize that the vast, vast majority of CUSOs are making things better rather than contributing to some perceived systemic risk. I would like to think of the services that CUSOs are providing as "systemic improvements" to the financial well being of credit unions as a whole.

I hope that NCUA will, as the song goes "accentuate the positive, eliminate the negative"

Sincerely

A handwritten signature in black ink, appearing to read "David J. Wright". The signature is written in a cursive, flowing style with some loops and flourishes.

David J. Wright
Chief Executive Officer