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September 20, 2011

Mary Rupp, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexander, VA 22314-3428
Email: regcomments@ncua.gov

Re: Comments to the Proposed
Amendments to the NCUA Regulations re:
CUSOs 12 CFR Parts 712 and 741

Dear Ms. Rupp:

Please be advised that Allegacy Services, LLC opposes the above referenced Amendment to the NCUA Regulations regarding CUSOs for the following reasons.

NCUA's regulatory requirements will add additional resource burdens on Allegacy Services. We currently provide a consolidated financial statement to our parent credit union, Allegacy FCU. We also provide financial information and review documents as requested during their NCUA examinations.

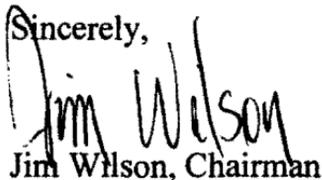
Allegacy Services, LLC is primarily a holding company for CUSOs that work on behalf of Allegacy FCU. As is the case in many start-up situations, some of our subsidiaries CUSOs are still working toward profitability while others are very profitable. We are on track to provide over a 15% ROE to Allegacy FCU this year. However, we are very concerned that your examiners may not have the industry specific expertise needed to acknowledge the timetable required for a new company to reach profitability.

The systematic risk that is referred to for these changes appears to be overstated. Investments in CUSOs only represent 22 bps of credit union assets. We are extremely concerned about having to submit business plans and client lists. These submissions place us at an extreme disadvantage in the marketplace with the ability for them to be made public via a FOIA request. We are also concerned that you would use the client list to inform credit union clients of information regarding our internal operations. We view this as a complete disregard for the corporate governance separation between a credit union and CUSO. We also would view it as a disadvantage for our CUSOs in comparison to other entities that could provide the same service for credit unions.

The proposed changes will be an additional regulatory burden layered on top of the various regulatory agencies that currently have oversight responsibilities to our subsidiaries. Such as; state department of insurance, state real estate commission, etc. With the other oversight agencies along with nonexistent systematic risk, additional regulatory burdens are not warranted.

I hereby formally request NCUA to withdraw the proposed amendment and prevent duplicate regulatory burden to our CUSO and credit union owners.

Sincerely,

A handwritten signature in black ink that reads "Jim Wilson". The signature is written in a cursive, slightly slanted style. The first name "Jim" is written in a larger, more prominent script than the last name "Wilson".

Jim Wilson, Chairman

cc. The Honorable Debbie Matz, Chairman
The Honorable Michael Fryzel, Board Member
The Honorable Gigi Hyland, Board Member