



FEDERAL CREDIT UNION

**SCHOOL DISTRICT 3 FEDERAL CREDIT UNION**

February 17, 2012

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

1180 Crawford Avenue  
Colorado Springs, CO  
80911  
Phone: 719-392-8439  
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[www.sd3fcu.org](http://www.sd3fcu.org)

Re: Proposed Amendments to NCUA's Loan Participation Rule

Dear Ms. Rupp:

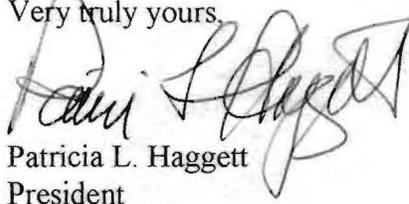
School District 3 Federal Credit Union would like to comment on NCUA's proposal to amend loan participations. Our \$18 million dollar credit union has a 43% loan to asset ratio and over ten percent of our loans are participation loans.

NCUA's proposed concentration limits will severely restrict our continued relationship with trusted loan participants. As a small credit union we do not have the resources to form relationships with multiple originators. This will inhibit our ability to continue to engage in loan participations.

We do not have a problem with the proposal to make originating credit unions retain at least ten percent (10%) interest in any loan through the life of the loan. This seems reasonable.

We urge you to reconsider this proposal. Thank you for the opportunity to comment.

Very truly yours,

  
Patricia L. Haggett  
President