

From: [Clint Hartmann](#)
To: [Regulatory Comments](#)
Cc: ["syashewski@tcu.coop"](mailto:syashewski@tcu.coop)
Subject: Clint Hartmann- Comments on Notice of Proposed Rule Making for Part 741, Maintaing Access to Emergency Liquidity
Date: Wednesday, September 26, 2012 5:44:19 PM

I would like to go on the record opposing the adoption of this proposed rule. The 2010 Interagency guide on liquidity is sufficient. Houston Texas Fire Fighters Federal Credit Union adopted a policy and set guidelines to follow in the event of a liquidity crisis. To pass a regulation in addition to the guidelines is not necessary and NCUA has not provided justification. In light of the current liquidity situation it is unlikely that liquidity issues will arise. If this proposed regulation goes forward there will be cost implications that are not justified.

Asset size is a questionable method of differentiation when it comes to liquidity needs. Additional indicators other than asset size should be examined if this proposal is to move forward.

Additional federal emergency liquidity sources beyond the CLF and the Fed's Discount Window should be allowed. An example are the Federal Home Loan Banks, as long as a credit union has sufficient qualifying collateral.

Again, I do not believe that this proposed regulation should move forward without additional consideration.

Clinton C Hartmann, CCUE
President/CEO



Houston Texas Fire Fighters
Federal Credit Union

PO Box 70009 | Houston, TX 77270-0009
P: (713) 293-6630 | F: (832) 494-1878
clinth@htffcu.org | www.htffcu.org

This message contains confidential information and is intended only for the individual named. If you are not the named addressee you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission.