

**From:** [Max Villaronga](#)  
**To:** [\\_Regulatory Comments](#)  
**Cc:** [syashewski@tcul.coop](mailto:syashewski@tcul.coop); [John F. Kirk](#); [Ricky Lewis](#)  
**Subject:** Max Villaronga\_Alamo FCU\_Comments on Notice of Proposed Rulemaking for Part 741, Maintaining Access to Emergency Liquidity  
**Date:** Thursday, September 27, 2012 10:50:01 AM  
**Attachments:** [image001.png](#)

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To whom it may concern:

I am opposed to the adoption of the final rule on emergency liquidity at this time. The current 2010 Interagency guidance is well written and sufficiently describes the expectation that credit unions need to identify, measure, monitor, and control their funding and liquidity risk. This guidance allows examiners the ability to look at the various steps in contingency planning we develop to ensure liquidity for our members is adequate. I encourage the NCUA to focus their efforts on credit unions that have significant liquidity risk for mandatory emergency liquidity sources being dictated. The majority of credit unions do not have liquidity shortfalls and well examined credit unions should have multiple short term, intermediate, and long term liquidity sources to tap in the event of liquidity demand. Credit Unions should have every opportunity to utilize the CLF or the Federal Reserve's Discount Window, but by no means should this be a mandate based on asset size. Asset size is not related to liquidity risk; poor liquidity management is correlated to liquidity risk. Thanks for your consideration and attention to my perspective.

Sincerely,

Max Villaronga

President & Chief Executive Officer



Alamo Federal Credit Union  
6577 First Park Ten Blvd.  
San Antonio, Texas 78213-4306  
[www.alamofcu.org](http://www.alamofcu.org)  
Phone: 210-554-8770  
Fax: 210-738-1251  
Toll Free: 800-727-1719

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