



DUKE UNIVERSITY  
FEDERAL CREDIT UNION

August 7, 2017

Gerard Poliquin, Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314-3428

RE: NCUSIF

Dear NCUA:

NCUA is currently evaluating options related to National Credit Union Share Insurance Fund. As this is deliberated, I simply request that NCUA consider the impact to various credit unions. With the economies of scale, smaller credit unions will struggle more with any additional expense.

Over the past decade, the number of credit unions with under \$10 million in assets have decreased by fifty percent. The creation and funding of the Temporary Corporate Credit Union Stabilization Fund created more financial challenges for smaller credit unions. As you are aware, industry results tend to be skewed by the credit unions which have over \$500 million in assets.

Since the Great Recession, Duke University Federal Credit Union has reached the \$100 million threshold. However, we do certainly miss the funds taken for the TCCUSF and could benefit from a reduction of dues as opposed to the recommendation currently being considered.

During 2010-2013, Duke University Federal Credit Union paid \$270,077 to the NCUSIF and an additional \$323,809 to the TCCUSF. Expenses of \$600k had a significant impact to our net income/net worth. Fortunately, the NCUA funds anticipated needs were more than reality. A refund is certainly welcomed. However, NCUA's proposed plan increases of the Normal Operating Level to 1.39 percent which would decrease the amount refunded to credit unions by approximately 60 percent. As you debate the amount to refund, please consider the original impact. A larger refund could help especially smaller credit unions.

It would be sad to see the industry merger rate increase due to such additional financial strain. Credit unions could receive some relief from refunds from the TCCUSF. Is a 9 basis point increase to the NOL necessary at this time? A larger refund and lower fees would be more beneficial.

Thank you for the opportunity to provide input on the proposed regulation.

Sincerely,

Daniel Berry, CEO

DUKE UNIVERSITY FEDERAL CREDIT UNION