

From: [Dean Wilson](#)
To: [Board Comments](#)
Subject: Dean Wilson - Comments on Stabilization Fund Closure
Date: Wednesday, August 09, 2017 4:34:54 PM

NCUA Board;

After sitting through the NCUA Webinar on the proposed Stabilization Fund Closure I would like to provide some narrative for the board consideration.

- I think it is imperative that board strongly consider closing the Stabilization Fund as credit unions across the country need to be able to utilize our members' equity to offer additional services, products and attract new members. Although I understand the need for the original assessments I think it would be incredibly short-sighted to not work to close the fund as expediently as possible.
- I am troubled by the belief of the board that they must add specific basis points protection in anticipation of uneven economic factors which in turn further penalizes credit union members by not refunding a larger amount to the natural person credit unions.
- Many credit unions have weathered significant economic factors and while doing this have either depleted some net worth or limited its' growth during the last 6-8 years. The Share Insurance fund normal target is 130 basis points and an assessment would be required by regulation when the fund dips to 120 basis points...which begs to differ isn't that 10 basis points designed to withstand economic events.
- Adding a specific 'padding' above the 130 basis points would make many credit union leaders uncomfortable as to when the required padding would be removed, if ever. Similar to the NCUA Budget, continuing to grow the fund requirements does not benefit natural person credit union members in anyway.
- If adverse economic conditions happened 5 years from now wouldn't it make sense to simply require the standard regulatory assessment at that time rather than keeping resources out of credit unions hands for that long?

Sincerely,

Dean C. Wilson
President/CEO

FOCUS Credit Union

P 262.437.1280

F 262.437.2570

MLO #14071



