

**From:** [Evie Rasmussen](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [Robyn Guyer](#)  
**Subject:** Requirements for Insurance; NCUSIF Equity Distribution  
**Date:** Monday, August 28, 2017 6:09:27 PM

---

To Whom it May Concern;

I am writing on behalf of United Advantage NW Federal Credit Union in Portland Oregon. We serve many union and non-union workers in the northwest. Hard working people whose lives were severely disrupted during the Great Recession. While we agree the merger between TCCUSF and NCUSIF will increase transparency and ultimately we can assume it will save costs, we do not agree with the remainder of this proposal.

When the funds we taken from us, the results brought us to our knees. Not only did we suffer along with our members, we also had our capital removed to protect our share insurance fund. However, make no mistake, those funds belong to the members they built it, they paid into it whether they realized it or not. These funds should be returned to the member via the credit union as quickly as possible.

The notion that NCUSIF needs to bring the ratio up to 1.39% based on one horrific event is simply not reasonable. One event does not a trend make, and to assume that a mere .9% addition to the fund will make a material difference, does not make sense. The funds belong back in the credit union to accurately reflect our financial position.

UANW urges NCUA to keep the normal operating level between 1.2% and 1.3%.

Moreover, credit union members should be returned the \$2.4 billion (plus) to the individual credit union, with a special dividend in 2018. Our members depend on us as we depend on you.

Thank you for the opportunity to respond to this proposal.

Sincerely,

Evie Rasmussen UANW

*Evie Rasmussen*

CO-CEO

United Advantage NW FCU

 [www.uanw.org](http://www.uanw.org)  (503) 283-5193 ext 232 or (800) 922-7390  (503) 283-5196

The information contained in this message or any attached document is confidential and intended only for individuals to whom it is addressed. If you received this message in error, please inform me immediately. Then delete the email message and any attachments. Any unauthorized use, distribution, or copying of this information is prohibited.

When sending confidential information to UANWFCU, please do not use unsecure e-mail. If you do not have a secure e-mail system, please create an account on our secure e-mail service by going to <http://secure-portal.entrustedmail.net>. Once logged in, you may send a message to our employees securely.

 Please consider the environment before printing this e mail.

