

**From:** [Richard Howdeshell](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [syashewski@cornerstoneleague.coop](mailto:syashewski@cornerstoneleague.coop)  
**Subject:** Richard Howdeshell—Comments on Requirements for Insurance; National Credit Union Share Insurance Fund Equity Distributions'  
**Date:** Thursday, August 31, 2017 3:54:27 PM

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1. I support closing the Temporary Corporate Credit Union Stabilization Fund, transferring the funds to the NCUSIF, and paying out equity distributions to federally insured credit unions.
2. I DO NOT support any of the 3 methods discussed in the material I have read. Specifically, the Current Equity Distribution Method, the Four Quarter Average of Insured Shares Method, or the Year-End Insured Share Balance Method. None of these relate directly to the amounts paid in by each affected credit union. This partial return of money that rightfully belongs to credit unions should be based on an equitable calculation of how the money was paid in. It should not be an enrichment for small or fast growing credit unions. You should determine the amount paid in by each credit union over the time period involved (FIFO) and base the payout on a pro-rata basis. Do the math! That's what you ask of us.
3. I DO NOT support increasing the fund level from 1.3% to 1.39%. This appears to simply be a way to withhold paying out money that belongs to credit unions. Increase the fund level only when circumstances clearly call for it.

**Richard Howdeshell**  
President/CEO  
Fort Worth Community  
Credit Union

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