



National Credit Union Administration  
Attn: Mr. Gerald Poliquin, Secretary of the NCUA Board  
1775 Duke Street  
Alexandria, VA 22314-3428

RE: Comments Proposed Rule – Requirements for Insurance, National Credit Union Share Insurance Fund Equity Distributions

As a stake holder, thank you for the opportunity to comment. As I understand the proposed changes, NCUA wants to close the Temporary Corporate Credit Union Stabilization Fund (TCCUSF), because the Stabilization fund has served its purpose and would be an equity transfer to insured credit unions in 2018 where these funds could go to work in the credit union system. MariSol FCU agrees with that assessment. Many of the dire projections from 2009 have not materialized and NCUA to its credit has been able to get nearly \$4 billion in legal recoveries. The stabilization fund should go back to credit unions.

However, NCUA proposes to transfer these TCCUSF assets to the National Credit Union Share Insurance Fund (NCUSIF), and raise the NCUSIF normal operating level from 1.30% to 1.39% in anticipation of future losses, a possible "mild" recession and to deal with potential unexpected losses/obligations from the Corporate Resolution Program.

It seems to me that NCUA has a pile of money that was intended for one purpose and now wants to keep some of that money for another purpose. That does not seem right. It lacks transparency. That money was established separately and intended to insulate the NCUSIF, not fund it.

What happens if the projections that NCUA has made to increase the fund to 1.39% do not come to fruition? Will credit union's get a refund? When? There is no written proposal on that topic.

MariSol supports the refund of the TCCUSF, but does not support the raising of the NOL to 1.39% because there is no written provision, no transparency when and if the Board will return the NOL to a normal operating level of 1.30%. That needs to be addressed.

Thank you for the opportunity to comment on the proposed regulation.

Sincerely

A handwritten signature in black ink, appearing to read "Robin Romano". The signature is stylized and somewhat cursive.

Robin Romano

CEO