

From: [Ging, Linda](#)
To: [Regulatory Comments](#)
Cc: syashewski@cornerstoneleague.coop
Subject: Comments on Requirements for Insurance; National Credit Union Share Insurance Fund Equity Distributions
Date: Monday, September 04, 2017 12:38:23 PM

Gentlemen:

Matagorda County Credit Union appreciates the opportunity to comment on NCUA's proposal concerning the amendment to the insurance requirements regarding equity distributions from the NCUSIF and equity distributions resulting from the Corporate System Resolution Program.

MCCU has assets of approximately \$27 million and serves about 2800 members. The Stabilization Fund assessments imposed on my credit union has been devastating. MCCU believes the Temporary Corporate Credit Union Funds should be closed in 2017 and the funds transferred to NCUSIF with payout distributions to federally insured credit unions.

MCCU does not support increasing the NOL from 1.30% to 1.39%. This should remain unchanged. Credit unions (small ones in particular) have been badly hurt already. There is no indication that an increase is necessary at this time.

MCCU supports using the LIFO method of equity distributions. MCCU also supports calculating a FICU's share for the NCUSIF equity distribution using the four quarter end average of insured share balances. *A full refund to credit unions now is the preferred solution.*

Thank you for allowing credit unions to voice their opinion on this proposal.

Yours truly,

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