



August 30, 2017

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

Dear Mr. Poliquin:

Re: NCUA Proposal to close the Temporary Corporate Credit Union Stabilization Fund and set the NCUSIF normal operating level

Truity Federal Credit Union (Truity) is appreciative of the opportunity to comment on the proposal to close the Temporary Corporate Credit Union Stabilization Fund and set the NCUSIF normal operating level. Truity is a federally chartered credit union with \$770 million in assets and close to 70,000 members with offices in Oklahoma, Texas, Kansas and Arkansas.

Truity has paid \$2,953,697.00 in assessments to the Temporary Corporate Credit Union Stabilization Fund and has incurred a \$1,000,000 loss of its equity investment in Southwest Corporate Credit Union. Truity believes that as a partial owner of the Temporary Corporate Credit Union Stabilization Fund (Stabilization Fund) it is due a distribution of all remaining assets in the Stabilization Fund which will be available after the liabilities of the Stabilization Fund have been paid in full. **We do not support the proposal that some of the assets of the Stabilization Fund would be used to increase the normal operating level of the National Credit Union Share Insurance Fund (NCUSIF).**

Truity would prefer that any distributions from the Stabilization Fund be properly identified as such when they occur. The NCUA proposal to merge the funds might allow for an earlier payback to the natural person credit unions that paid assessments but it also appears to be a convenient method to increase the NCUSIF without full transparency of the reasons why.

The NCUSIF operating level of 1.20 to 1.30 has proven to be sufficient to withstand a moderate recession since its inception. The NCUSIF required assessment since the start of "The Great Recession" in 2008 – were reasonable given the severe economic conditions.

Truity is willing to wait a few more years to receive a distribution from the Stabilization Fund in order to receive all the funds that it is due to offset the assessments and losses that we have incurred.

Truity agrees with NCUA's proposal that the "Last In – First Out" method of calculating distributions from the Stabilization Fund is preferable to the "First In – First Out" method. We also agree with NCUA's proposal to calculate a federally insured credit union's share of NCUSIF distributions using the average of insured share balances over four quarter-ends.

Thank you again for the opportunity to provide input on these very important proposals.

Sincerely,



Dennis P. Halpin  
Executive Vice President – CFO

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