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August 31, 2017

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

Dear Mr. Poliquin,

My name is John Hays and I serve as CEO of Access Community Credit Union. I am writing you on behalf of our senior team, board directors and the 11,000 members we serve in West Texas. This comment regards the proposed closure of the Temporary Corporate Credit Union Stabilization Fund and the proposed increase to the NCUSIF normal operating level (NOL) to 1.39 percent.

We agree it is time to close the stabilization fund and merge it into the NCUSIF. We also believe the LIFO approach to distributions is most likely the best. We are troubled by what appears to be an excessive proposal of the NOL in conjunction with the continued increase in NCUA's operating expenses. We do not believe it's reasonable for NCUA to hold this dollar amount captive from credit unions. These funds should be returned to credit unions for reinvestment in the member communities that they serve. If the industry faces another crisis, then the NCUA could once again assess a premium, but has no right to hold hundreds of millions of dollars under the pretense of mitigating any potential risk of loss from the stabilization fund.

In short, we urge the NCUA to re-examine the proposed increase in the NOL, along how they might better control operating expenses in the future. Putting the maximum amount back in control of credit union's will yield far better returns for the health of the industry and the NCUSIF in the long run.

We appreciate the opportunity to comment on the proposal. If you have any questions please feel free to contact me at jhays@accesscu.net or 806-353-9999.

Respectfully,

A handwritten signature in blue ink, appearing to read "John Hays", with a long, sweeping horizontal line extending to the right.

John Hays
President/CEO
Access Community Credit Union