

**From:** [Jim Blaine](#)  
**To:** [Regulatory Comments](#)  
**Subject:** 12 CFR Part 746 RIN 3133 - AE69  
**Date:** Monday, August 07, 2017 6:26:19 PM

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Gerard Poliquin  
Secretary to the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314

Re: Appealing Material Supervisory Determinations  
12 CFR Part 746 RIN 3133 - AE69

Dear Mr. Poliquin:

Please keep this a secret and don't quote me on it, but with this proposal it must be said...  
***NCUA ROCKS!***

Would suggest one enhancement to the proposed rule; **please consider publishing a synopsis of each appeal initiated and a summary of the final results of each appeal.**

A synopsis/summary should simply include the name of the parties - petitioner and program office, the nature of the dispute (ex "composite CAMEL rating"), reporting dates, and final resolution (ex. "CAMEL adjusted", "denied").

**Four potential benefits:** 1) will reduce the number of frivolous appeals, 2) will encourage early resolution of disagreements, 3) will create a public record to monitor the source and substance of issues appealed, and 3) will enable the public to track the effectiveness of the appeals process.

The new leadership at NCUA has rightfully put 'fairness, transparency, and predictability' in the forefront of all Agency actions. ***Full transparency is key.*** Credit unions nor NCUA should be "embarrassed" by reasonable disagreements; in fact, it is the dearth of appeals over the years which has repeatedly - and rightfully - called the integrity of NCUA's appeals process into question.

***"Secrecy destroys accountability"*** - for both credit unions and the NCUA.

Sincerely,

Jim Blaine