



**South Carolina Methodist Conference Credit Union**  
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August 31, 2017

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

RE: NCUA's proposal to close the temporary corporate credit union stabilization fund and set the share insurance fund normal operation level.

Dear Mr. Poliquin,

On behalf of the South Carolina Methodist Conference Credit Union, I am writing you regarding the above referenced proposal. We greatly appreciate the opportunity to comment on this proposal. In addition to reviewing the proposal, a review of several of the comments made to date and their supporting references has been made.

As a very small credit union, the expenditures to the Stabilization Fund were a tremendous burden and resulted in a significant reduction in the equity condition and the credit union's ability to grow and enhance the level of service to the membership. This adverse impact is compounded by being required to pay for conditions for which we were not responsible.

After consideration of the proposal and other related information, it seems appropriate that all unused funds collected from credit unions for the Stabilization Fund be returned to the credit unions. These funds are long needed to enhance equity positions and fund expanded services for members. Should this appropriate action be taken, there would likely be no need to merge the Stabilization Fund into the Share Insurance Fund. This action appears to be well within the NCUA's authority as granted in the Federal Credit Union Act.

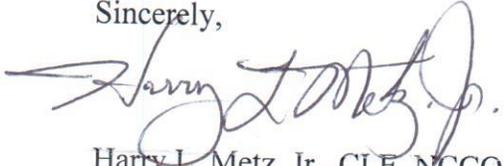
As to the proposed increase in the normal operating level of the Share Insurance Fund, we find no justification. The current normal operating level of 1.30% was more than adequate enough to enable survival of the "Great Recession" which is often referred to as

the greatest economic disaster since the Great Depression. Unless it is anticipated that such an event is to recur frequently, the current normal operating level will be sufficient.

There may be an issue concerning the Share Insurance Fund's future operating expenses. This is an issue that has been faced by credit unions for many years. It will be necessary for increased control and limits on operating expenses for the Share Insurance Fund as it has for this and most other credit unions.

In conclusion, we urge the agency to refund all available funds to the credit unions and maintain the current Share Insurance Fund operating level.

Sincerely,

A handwritten signature in black ink, appearing to read "Harry L. Metz, Jr.", written in a cursive style.

Harry L. Metz, Jr., CLE, NCCO  
Assistant Manager