



## STATE COLLEGE FEDERAL CREDIT UNION

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August 31, 2017

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

RE: Merging of Stabilization Fund & Share Insurance Fund

Dear Mr. Poliquin:

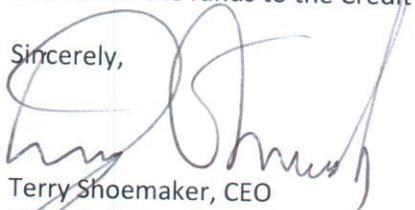
Let this correspondence serve as our Credit Union's opposition to the combining of the Stabilization Fund and Share Insurance Fund, as well as raising the Normal Operating Level (NOL) to 1.39%. We do not feel this is in the best interests of Credit Unions large and small.

Given that each Credit Union was required to pay into the Stabilization Fund at a time when all of us were adversely affected by the economic downturn at that time, it seems only fair that we receive a return based on what we each paid into the Fund. A common sense approach, don't you think?

Regarding the NOL, why fix what is not really broken? For a number of years the 1.30% threshold level has worked just fine; we managed to have this level see us through the downturn period. Given that your organization is so keen on "gloom and doom" scenarios, your proposal is not surprising. However, for those of us "in the field" helping to improve our members financial lives, we choose to be optimistic yet practical. Stick with what has worked for years and stop considering additional financial burdens on each Credit Union.

Finally, merging the two funds and increasing the percentage level will not likely be transparent and only increase confusion over where and how each Credit Union's funds are applied. Please do the right thing and return the funds to the Credit Unions and keep the NOL at 1.30%.

Sincerely,



Terry Shoemaker, CEO  
State College Federal Credit Union