

From: [Jeff Jorgensen](#)
To: [Regulatory Comments](#)
Subject: Comments RE:12 CFR Part 741
Date: Tuesday, September 05, 2017 11:32:58 AM
Attachments: [image010.png](#)
[image011.png](#)

Dear NCUA Board Members;

While I appreciate the attempt of combining the two disparate insurance pools we currently maintain, I believe the “devil is in the details!”

My members suffered a severe loss of capital approximately 10 years ago, the capital that was created by their predecessors and their coworkers/family/friends. The thought of being able to return ALL of that to them is extremely enticing and exciting, but I cannot support it in its entirety as proposed.

If NCUA believes that there is truly an exposure of this magnitude in an “Adverse” scenario, let alone a “Severely Adverse” scenario, then the costs of this merger FAR outweigh the possible benefits of this merger at this time. You have proposed to increase the SIF equity ratio to 1.39% as a “cushion.”

If, and ONLY if, you can allow the SIF to maintain the current equity ratios (which have stood during this past ~10 years of turmoil), then I would support your proposal.

Thank you for the consideration of my comments.

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