

September 5, 2017

Nancy M. Croix-Stroud, CEO

First Class American Credit Union

2595 Polaris Dr.

Fort Worth, Tx. 76137

Gerald Poliquin

Secretary of the Board

National Credit Union Administration

1775 Duke Street

Alexandria, VA. 22314-3428

Dear Mr. Poliquin:

My name is Nancy Croix-Stroud and I am the CEO of First Class American Credit Union. I am writing concerning the National Credit Union Administrations (NCUA) proposal of the proposed closing of the Temporary Corporate Credit Union Stabilization Fund in 2017 and to payout distributions in 2018.

We support the closing of the Temporary Corporate Credit Union Stabilization Fund to credit union's, however we do not support raising the equity ratio up to 1.39%. This proposal would divert the funds that credit union's paid in assessments to fund the stabilization fund. This funding was made up from earnings that would have been returned to our members in the form of dividends and lower interest. This money should be returned to the credit union's so that we are able to offer more, or improved, services to our members. Our credit union, as a result of paying assessments, delayed opening a branch. We are in the process of building that branch.

Returning the funds to our credit union would increase our capital and in turn allow us to offer more services/products to our members.

Credit Unions are more capitalized than they were in 2008 and are much better positioned to handle any downturn in the economy if it should happen. Credit Union's have continued to build their capital since 2008. In 2008 credit union capital ratios were at 10.64% and now stand at 10.88%.

I would urge NCUA to close the Temporary Corporate Credit Union Stabilization Fund however to distribute more of the rebate back to credit unions. This rebate makes us stronger, and we are able give back more to our members. Our members are the true owners of this money.

Thank you for your consideration.

Nancy M. Croix-Stroud

President/CEO