



National Association of Federal Credit Unions

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April 29, 2009

Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

RE: Comments on Notice of Proposed Rulemaking on Operating Fees

Dear Ms. Rupp:

On behalf of the National Association of Federal Credit Unions (NAFCU), the only trade association that exclusively represents the interests of our nation's federal credit unions (FCUs), I am responding to the request for comments by the National Credit Union Administration (NCUA) regarding its proposed rule on the credit union operating fee.

The NCUA's proposal would exclude investments made under the Credit Union System Investment Program (CU SIP) and the Credit Union Homeowners Affordability Relief Program (CU HARP) from the definition of total assets for the purpose of calculating the credit union operating fee. NAFCU supports the proposed rule.

The CU SIP and CU HARP investments artificially inflate assets and decrease capital for those credit unions that do participate. Consequently, including CU SIP and CU HARP investments as assets creates a disincentive for credit unions to participate in both programs. Given the current condition of the corporate credit union system, NAFCU applauds the NCUA for using its authority to minimize, to the extent possible, the costs of assisting corporate credit unions.

NAFCU appreciates this opportunity to share its comments on the proposed guidelines. Should you have any questions or require additional information please call me at (703) 842-2212 or (800) 336-4644 ext. 212.

Sincerely,

Dillon Shea
Associate Director of Regulatory Affairs