

Illinois Credit Union League

P.O. Box 3107
Naperville, Illinois 60566-7107

May 4, 2009

Via e-mail

Ms. Mary Rupp,
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428

Re: *National Credit Union Administration Proposed Rule to amend Federal Credit Union Operating Fee Assessment*

Dear Ms. Rupp:

We are pleased to submit this comment letter on behalf of our member federal credit unions (“FCU”) to the National Credit Union Administration’s (“NCUA”) proposed rule affecting Federal Credit Union Operating Fees.

As proposed, the rule will exclude investments made by a FCU under the Credit Union System Investment Program (“CU SIP”) and the Credit Union Homeowners Affordability Relief Program (“CU HARP”) from the FCU’s total assets for purposes of calculating its operating fee. CU SIP and CU HARP are initiatives developed not only to aid in the infusion of liquidity into the corporate credit union system, but also to generate a more vibrant economic climate for natural person credit unions and their members.

This rule illustrates a great deal of foresight by the NCUA. Assessing a fee to participate in programs established to incentivize investment and lending would undoubtedly be regarded as a disingenuous measure. By excluding CU SIP and CU HARP investments from operating fee assessments, the proposed rule will effectually remove any inherent disincentives for FCU’s to participate in such initiatives.

We appreciate the opportunity to comment on the proposed rule.

Very truly yours,

ILLINOIS CREDIT UNION LEAGUE

Brad R. Bergmooser
Compliance Analyst

cc: Legislative Committee
Regulatory Action Team

Don Edwards