

**From:** Bill Roberts [billroberts@northland.org]  
**Sent:** Monday, February 02, 2009 6:53 PM  
**To:** \_Regulatory Comments  
**Subject:** Bill Roberts - Comments on Advanced Notice of Proposed Rulemaking for Part 704

Dear NCUA,

I am thankful for your efforts to help preserve the credit union movement. Although, I do believe you acted in haste with the proposition to penalize the earnings of all credit unions to bolster the balance sheet of US Central Federal Credit Union.

I manage a small credit union with limited earnings potential in this current economic environment. The impact of the proposed method of funding USCFCU's losses through the current year's earnings of all credit unions would be devastating to our bottom line. The amount proposed represents about 2 times our current annual earnings.

We have the equity - at 11% - to fund this assessment from reserves and the impact would be less painful if done by that method. Most credit union's currently are over reserved. And isn't that what the term "Reserve" stands for? To not use the credit unions' vast reserves and punish credit unions by slamming their bottom line will do more damage than good in my opinion.

The impact of transferring from earnings will only cause the loss of credit unions, credit union employees, credit union programs, credit union charitable giving, credit union confidence, etc.

You are showing USCFCU charity by moving to bolster their bottom line and balance sheet. Who will show small credit unions any charity when we start to falter and fail.

Thank you for reading my letter.

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