

**Jordan, Sheron Y**

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**From:** Ronald Budzinski [rbudzinski@firsttrustcu.com]  
**Sent:** Wednesday, March 25, 2009 6:40 PM  
**To:** \_Board Mail  
**Subject:** Advance Notice of Proposed Rulemaking to 12 CFR Part 704

Dear Ms. Rupp;

On behalf of our Board and management of First Trust Credit Union, I am commenting on the ANRP to 12CFR Part 704. We appreciate NCUA allowing credit unions the opportunity to share our thoughts and viewpoints. We are members of Corporate One FCU and Members United Corporate FCU.

Corporate One FCU is our processor for Image check processing, Alliance One ATM network, ACH receipt, wires international and state side, funding, and investments with Corporate One FCU or through their Simply CD network We use Members United FCU for our ATM network, debit cards and investments. They are a great corporate and have a great staff.

We try to invest our money in Corporate credit unions instead of Banks. Therefore it's important to our credit union that we have multiply corporate which we can use, instead of just one or two. This prevents us from having concentration risk in one Corporate. If you require that we have to have a capital deposit at each corporate to invest money, we would have do our investments with more banks. We can't afford having a capital deposit in each corporate making little or no interest.

We would not do business with a Corporate at a great distance, because we may attend the annual meeting and we would be concerned about the travel cost.

I believe that corporate credit union capital should be risk base. The amount of capital needed would be based on their risk. Corporate credit unions should have a risk assessment department to measure their risk company-wide. Corporate credit unions should be able to manage their own investments based on their investment. Policy. I believe that should be able to use leveraging in the market as long as they have a match with their borrowing and the investment. This should only be allowed for investment less than one year.

If you are trying to separate the processes the corporate does for credit unions from the investment and borrowing process. The corporate providing the services could set up a CUSO to handle the processing.

Sincerely,

Ronald J Budzinski, President/CEO