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General Comment:Heartland Credit Union?s response to ANPR ? 3/31/2009

While many areas are addressed within the ANPR, I want to share how Heartland uses the corporate credit union and its value to us.

Heartland has always used Members United for our clearing and settlement account, short term investments, both short and long term loans and market investments. The ability or comfort to maintain our clearing account at levels well over the insured amount is a benefit we appreciate. As a small credit union
($81M) we could not afford the expense of wiring money daily between financial institutions to fund our clearings. Heartland also uses Members United for all our ACH origination and wire transfers.

As our corporate, we also know they are there as our resource and will help us work through areas we may not have as much expertise. We turn to corporate for our annual ACH audit and assistance with excess liquidity.

Having worked at a credit union that didn?t use the corporates when I started I know there are other options ? however the banks were not there to help us grow, they were there to make money. Losing the corporate credit union structure would be a blow to credit unions ? especially to the small and mid-sized credit unions.