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From: Charisse Miller [cmiller-ibew116@sbcglobal.net]
Sent: Friday, April 03, 2009 1:37 PM
To: _Regulatory Comments
Subject: IBEW 116 FCU comments on Advanced Notice of Proposed Rulemaking for Part 704

IBEW 116 Federal Credit Union
Response to ANPR

April 3, 2009

IBEW 116 Federal Credit Union is located in Fort Worth, Texas and is a member of Southwest Corporate Federal Credit Union. We use SWFCU for our overnight investment funds, for purchasing certificates of deposit and utilize its Simply CD program for purchasing institutional CDs from other financial institutions. Additionally we have an open line of credit for borrowing for liquidity needs. We utilize their payment systems for receiving ACH, share drafts, and bank wire transfers. Southwest Corp is our single source financial services institution. IBEW 116 FCU is a \$2.9 million credit union. We are small and cannot do these retail type of services without a corporate credit union to provide this source of services to us. They provide all our liquidity needs as well as all our payment systems needs. If SWCorp were not available to us to provide ALL these services we would have a difficult time locating a single source institution to provide all these services at a price in which we could afford.

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