

From: Cassia Dahl [gemcass@srt.com]
Sent: Monday, April 06, 2009 3:25 PM
To: _Regulatory Comments
Subject: Comments on ANPR for Part 704

My name is Cassia Dahl and I am the president of G E M Federal Credit Union in Minot, ND. We are a \$15 million closed membership credit union in North Dakota that relies very heavily on Midwest Corporate Federal Credit Union for services such as:

- Settlement & Clearing Account for the credit union
- All of our investments through their Simpli-CD program
- Line of Credit
- Item Processing Service for Drafts
- APEX - ACH Services
- Cash Concentration
- Corporate Share Drafts
- Wire Transfers
- Education
- Many other services that help us to operate on a daily basis

I would like to address some of the issues raised in the ANPR as follows:

- I do favor keeping the structure the same as it is now with the two-tiered system.
- I do believe the current regulations on liquidity management are appropriate.
- That the national fields of membership was not the cause of the current problems.
- I would like to see the NCUA retain the OCCU as a separate operating arm.

I do not claim to be an expert on all of the technical questions that were a part of this questionnaire, however I do know that we rely heavily on Midwest Corporate daily to help us effectively run our credit union and service our members. We would be negatively impacted if we were forced to become a number in a huge corporate system should some of the changes that have been proposed come about.....not only in the personal service received, but also in the cost of services.

If you have any questions, please feel free to contact me.

Thank you for your time.

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