

Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428

Dear Ms. Rupp:

With regard to the NCUA Advanced Notice of Proposed Rulemaking request for comment, I would like to address the following:

First, I would like to stress that the premium NCUA is proposing on credit unions be transferred from the reserves. This would lessen the extreme burden this is taking on credit unions.

Second, I would like to address the role of Corporates in the Credit Union System. Our credit union is located in Montana. We are not a very populated state and do not have access to some of the "big" business opportunities other states may have. Therefore; most products needed to run a business are very expensive but we must offer the products to be able to survive in a competitive financial services business.

The products and services provided to our credit union by our corporate, Treasure State Corporate Credit Union, are invaluable and critical. We rely heavily on our corporate for all our payment systems. We also use our corporate for the majority of our investments. At times we have used the corporate for liquidity issues as well. We are a small credit union and if our corporate were to vanish, we would most likely be put out of business. All of the the products and services provided by our corporate would be very costly to replace. The reliability and confidence we have in our corporate comes from years of excellent service and sincerity on the part of our corporate. The service is second to none. Losing our corporate would force us to drastically raise our fees and we would not be able to extend our membership the services and rates we now do. At that point we would have to become a bank to hope to be able to continue to operate.

I am sure NCUA will be very prudent when addressing these rule changes and will consider the needs of smaller credit unions.

Sincerely,

Connie McNamara
Manager
EnerGComm Federal Credit Union
Butte, Montana