

**From:** [Jeff Roberts](#)  
**To:** [Regulatory Comments](#)  
**Cc:** ["Jim Thompson"](#)  
**Subject:** Jeff Roberts - Comments on Advanced Notice of Proposed Rulemaking for Part 704  
**Date:** Monday, April 06, 2009 5:25:19 PM

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Dear Ms. Rupp,

On behalf of the management and Board of Beacon Community Credit Union, I would like to take this opportunity to comment on the recently issued Advance Notice of Proposed Rulemaking (ANPR) to 12 CFR Part 704.

We commend the NCUA for allowing natural person credit unions the opportunity to express our thoughts and viewpoints as a part of this evaluative process.

Beacon Community Credit Union is \$40 million in assets, has 10,101 members, and serves the metro Louisville, KY area. We are currently members of Kentucky Corporate FCU and use the following services from Kentucky Corporate:

Settlement, ACH Origination, ACH Receipt, International Wires, Domestic Wires, Line of Credit, Investments, SimpliCD, Security Safekeeping, and BSA Training.

We feel that Kentucky Corporate provides outstanding services to us and we consider them to be vital to the operations of Beacon Community Credit Union. Other alternatives could prove to be more costly, and to be less reliable than Kentucky Corporate.

I truly believe that the current corporate network has worked very well and will continue to work well for credit unions. It is true that some corporates bought into too large a concentration of mortgage-backed securities, although they were AAA rated at the time. Going forward, they should limit their concentration of risk, and not place all reliance on the rating agencies. More due diligence should be required by the corporates. The loss of state corporates would escalate further loss of small credit unions.

In closing, we appreciate the opportunity to comment regarding the future of the corporate system and understand that sound and prudent judgment dictates that NCUA and the industry carefully review the role and structure of the corporate system going forward.

We encourage the agency to keep our views and needs in mind regarding the new regulation as we feel a healthy and strong corporate system is essential to assist us in serving our members.

Sincerely,

Jeffrey J. Roberts  
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