

YOUNG, SHERON

From: _Regulatory Comments
Sent: Monday, September 26, 2005 8:55 AM
To: YOUNG, SHERON
Subject: FW: Comments on Proposed Rule for 12 CFR Part 741

From: jjunkin@rbfcu.org [mailto:jjunkin@rbfcu.org]
Sent: Friday, September 23, 2005 4:50 PM
To: _Regulatory Comments
Subject: Comments on Proposed Rule for 12 CFR Part 741

Mr. Mary Rupp
Secretary to the NCUA Board

We are in agreement with the proposed change to Part 741.8 relating to the sales or purchase of loans or other assets.

As to the proposed change to Part 741.3, we are in agreement. The requirement that investments by FISCUs be of investment grade is consistent with safeguarding both the credit union and the NCUSIF. Consequently, the removal of the current requirement for a FISCU to establish a special reserve for nonconforming investments would be appropriate.

We also agree with the proposed change to extend some of the limits in the CUSO rule to FISCUs.

These changes would give more consistent treatment for FISCUs and FICUs.

Jimmy Junkin
SVP Finance
Randolph-Brooks Federal Credit Union

9/26/2005