



THE ASSOCIATION *of*  
CORPORATE CREDIT UNIONS  
*www.theaccu.org*

August 25, 2006

Ms. Mary Rupp  
Secretary to the Board  
National Credit Unions Administration  
1775 Duke Street  
Alexandria, VA 22314-3428

Via email: [regcomments@ncua.gov](mailto:regcomments@ncua.gov)

Dear Ms. Rupp:

The Association of Corporate Credit Unions (“ACCU”) appreciates the opportunity to submit comments in response to the National Credit Union Administration’s (NCUA) notice of proposed amendments to rules and regulations regarding requirements for Suspicious Activity Reports. By way of background, ACCU is the primary trade association for 29 of the country’s corporate credit unions located around the country. Corporates provide liquidity, investment products, payments settlement and other financial services to the nation’s federal and state-chartered credit unions.

The ACCU applauds the NCUA’s efforts to provide “consistency with SAR regulations established by the other Federal Financial Institutions Examination Counsel regulators.” As such we agree with the proposed changes and appreciate that there will be no added regulatory burden to corporate credit unions and credit unions alike.

Thank you for allowing the ACCU to submit this comment in response to this proposal. Please feel free to call me if you have any questions concerning this issue.

Very truly yours,

Michael F. Canning, Esq., CAE  
Executive Director