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Date 7-10-2005

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

JUL 15 '05 PM 12:02 BOARD

RE: Proposed Interpretive Ruling and Policy Statement No. 05-1

Dear Ms. Rupp:

Denali Alaskan Federal Credit Union understands that the National Credit Union Administration ("NCUA") is proposing to adopt an Interpretive Ruling and Policy Statement ("IRPS") regarding Sales of Nondeposit Investments, which will replace the NCUA Letter to Credit Unions No. 150.

We are writing to provide general comments on the IRPS as follows:

1. Regulatory Flexibility Act

According to the NCUA, the IRPS will not have a significant economic impact on the small credit union. We disagree. Every time acts must be repeated without compensation, there is cost. We presently have a Broker-Dealer relationship that reviews our activities and processes, and to duplicate that is senseless.

2. Paperwork Reduction Act

According to the NCUA, the IRPS will not increase paperwork requirements. We disagree because our Broker-Dealer too currently accomplishes this. The compliance requirements, manpower and paperwork redundancy would be enormous.

3. Proposed Contract Provisions

The proposed contract provisions may negatively affect and/or are not practical for credit unions. The brokerage firm is much more suited to evaluate suitable securities and ensure compliance. At present our structure would not allow monitoring compliance without incurring substantial expense, and adding a redundant layer of bureaucracy (which in it's self can be very expensive.

4. Compliance with the requirements of the IRPS and applicable law and regulation.

The proposed compliance requirements may negatively affect and/or are not practical for Denali Alaskan Federal Credit Union. Reviews and disclosures are currently subject to the OSJ/Compliance department review systems and also subject to oversight by the SEC, NASD and State Division of Securities regulators. To add additional layers of review seems illogical.

5. Dual Employees

The proposed restrictions on dual employees may negatively affect and/or are not practical for our Credit Union. Dual employees are the employees who have appropriate licensing and securities experience. Member welfare is dependent upon the presence of the Dual Employee to help provide guidance. Further, the securities registered dual employee provides an efficient and comprehensive resource to members and staff.

6. Non Deposit Sales to Nonmembers

We disagree with the IRPS proposal on sales to non-members. Recovery of direct and indirect expenses related to Non Deposit Sales to Nonmember business is appropriate and necessary.

In summary, we believe that requiring credit unions to have independent compliance functions is not practical, redundant, unjustifiably expensive, and burdened with risk.

Should you have any questions, please contact me at.

Sincerely,



Mick Brogan
Program Manager- Platform Services
Denali Alaskan Federal Credit Union
3400 Latouche Street
Anchorage, Alaska 99508