

YOUNG, SHERON

From: _Regulatory Comments
Sent: Monday, August 15, 2005 9:12 AM
To: YOUNG, SHERON
Subject: FW: Comments on Proposed Regulation 796

[Please adobe to Web](#)

-----Original Message-----

From: Kevin Day [mailto:kday@bryantcu.org]
Sent: Monday, August 08, 2005 10:28 AM
To: _Regulatory Comments
Subject: Comments on Proposed Regulation 796

Given all the attention that has been focused on corporate governance since the Enron/Worlcom/Tyco scandals, and the necessity to insure that the audit function has the ability to impartially monitor the affairs of an organization, the Proposed Regulation sets a positive tone in this respect.

It shows that NCUA is striving to ensure that the examiners who are sent into the field, and into a given credit union for an extended period of time, can't use their position as a senior examiner to leverage their way into a credit union that they have been examining. By eliminating the possibility of employment by a credit union in this situation, the proposed regulation will hopefully allow senior examiners to faithfully perform the fiduciary responsibility they have to certify the true standing of a credit union to the NCUA, the Board of the credit union, and indirectly, to the membership of that credit union.

The only question that I have is this: Is twelve months a lengthy enough period to ensure that any issues that could arise from a senior examiner going to work for a credit union that (s)he has had a substantial role in the management of have been determined and addressed? I would feel more comfortable with a 24 month (2 year) period before a senior examiner could work for a credit union in such a situation. That time frame would eliminate all appearances of impropriety, as well as allow for a couple of exams to be done by other lead examiners.

Thank you for your time in reading this response.

Kevin F. Day
Vice President
Bryant Credit Union
380 River Street
Springfield, VT 05156
(802) 886-4228, extension 11
(802) 886-1268, fax