



September 27, 2005

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

Re: Comments on Proposed Rule 796, Post-Employment Restrictions

Dear Ms. Rupp:

I am writing on behalf of the National Association of Federal Credit Unions (NAFCU), the only trade association that exclusively represents the interests of our nation's federal credit unions, in response to the National Credit Union Administration's (NCUA) request for comment on its proposed rule that implements post-employment restrictions for certain NCUA examiners. NCUA is required to prescribe rules regarding the restrictions pursuant to the Intelligence Reform Act, Pub. L. 108-458 (2004).

The proposed rule prohibits senior NCUA examiners from employment with a credit union for one year if the examiner had continuing, broad responsibility for examination of that credit union for two or more months during the examiner's last twelve months of employment. NAFCU believes that the rule as drafted is appropriate to carry out the post-employment restrictions contained in the Federal Credit Union Act, as amended by the Intelligence Reform Act. In particular, NAFCU believes that the definition of senior examiner is sufficient to fulfill the purpose of the statute.

NAFCU also believes that former examiners can contribute much needed knowledge and expertise to a credit union, and such employment opportunities should not be denied. NAFCU does understand, however, the need to avoid potential conflicts of interest. Accordingly, NAFCU supports the general rule, but also supports NCUA's ability to waive the one-year restriction in unusual circumstances.

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NAFCU would like to thank you for this opportunity to share its views on this proposed rule. Should you have any questions or require additional information, please call me or Carrie Hunt, NAFCU's Associate Director of Regulatory Affairs, at (703) 522-4770 or (800) 336-4644 ext. 234.

Sincerely,

A handwritten signature in cursive script, appearing to read "Fred R. Becker, Jr.", written in black ink.

Fred R. Becker, Jr.
President/CEO

FRB/crh