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May 3, 2005

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

RE: Request for Comment: CUSO Financial Statement Audit Requirements 05-EA-06

To Whom It May Concern:

I would like to take this opportunity to comment on the above referenced proposal concerning CUSO Financial Statement Audit Requirements.

This credit union supports the proposed changes to the rule whereby a wholly-owned CUSO does not have to submit to a separate financial statement audit if the parent credit union includes the CUSO in its annual consolidated audit. We also agree that the proposal be extended to include CUSO's in which parent credit unions own a majority share.

We have no other additional comments regarding the proposal.

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We appreciate the opportunity to comment and request your consideration of these comments.

Sincerely,

Karen Ellis

Security/Compliance Officer

