

Illinois Credit Union League

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VIA E-MAIL TRANSMISSION
regcomments@ncua.gov

June 22, 2006

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

Re: Amendments to Share Insurance; Interim Final Rule Part 745

Dear Ms. Rupp:

We are pleased to respond on behalf of our member credit unions to the National Credit Union Administration's request for comment concerning amendments to the share insurance rules. The Illinois Credit Union League represents over 400 federal credit unions and federally insured state chartered credit unions.

The Illinois Credit Union League commends the NCUA for its amendments to the share insurance rules. The amendments are vital in keeping credit unions competitive within the marketplace. Specifically, the increase in IRA and Keogh accounts from \$100,000 to \$250,000. On the topic of employee benefit plans, we agree with the NCUA that it would be appropriate to provide full share insurance coverage to all participants, regardless of whether the participant is or is not a member of the credit union, as long as the trustee or employer sponsoring the plan is a member. The amount of insurance coverage for the non-member participants in the employee benefit plan should equal that of the member participants. To penalize a participant in an employee benefit plan, because of member status, when in fact it is out of their control, would be unfair.

We appreciate the opportunity to respond to NCUA's request for comment concerning amendments to the share insurance rules. We will be happy to respond to any questions regarding these comments with agency staff.

Very truly yours,

ILLINOIS CREDIT UNION LEAGUE

By: Niall K. Twomey
Technical Specialist

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