

December 9, 2008

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

RE: 12 CFR Part 740 and 745; RIN 3133-AD55
Temporary Increase to the Standard Maximum Share Insurance Amount.

Advantis Credit Union is a state chartered credit union serving members in eleven counties in Oregon. We appreciate the opportunity to comment and would like to call NCUA's attention to a supplemental matter related to the temporary increase of the Standard Maximum Share Insurance Amount (SMSIA).

When Congress passed the Federal Deposit Reform Act of 2005, it increased federal deposit insurance coverage for certain retirement accounts in banks and thrifts. The accounts covered by this increase include IRA, KEOGH, and deferred compensation plans under section 457 of the Internal Revenue Code. With the passage of the Federal Deposit Insurance Reform Conforming Amendments Act of 2005, Congress also increased share insurance coverage for credit unions, but this increase only applied to IRA and KEOGH accounts. As a result, deferred compensation funds deposited at banks and thrifts were federally insured up to \$250,000 while deferred compensation funds deposited at credit unions were tied to the Standard Maximum Share Insurance Amount ("SMSIA"). The SMSIA was \$100,000 until the emergency Economic Stabilization Act of 2008 temporarily increased it to \$250,000.

The temporary increase is scheduled to expire on December 31, 2009, at which time coverage on 457 Plan deferred compensation accounts at credit unions will drop back to \$100,000, renewing the disparate treatment of such accounts at credit unions and accounts at banks and thrifts. If Congress should increase coverage for "certain retirement accounts" for banks above the SMSIA, as it did in 2005, that increase would apply to 457 Plan accounts at banks and thrifts, but not at credit unions.

To ensure continued parity with FDIC insured financial institutions, share insurance coverage on 457 plan deferred compensation accounts at credit unions should not be tied to the SMSIA. Instead, deferred compensation accounts under Section 457 should be added to the list of retirement accounts with special coverage in the Federal Credit Union Act, 12 USC 1787(k) (3).

Thank you for the opportunity to comment. If you have questions, please feel free to contact me at 503-785-2482.

Sincerely,



Ronald A Barrick
President/CEO
Advantis Credit Union