Dear Mr. Smith:

The Association of Corporate Credit Unions is the primary trade association for the nation’s 30 corporate credit unions. Corporate credit unions have been called “credit unions for credit unions.” They provide liquidity, technology, payment systems and safety and soundness consulting to natural person credit unions nationwide. Having roughly $100 Billion dollars in assets under management, corporates also serve as an important investment partner for the credit union industry.

We have been following the evolution of EITF Issue 03-1 with great interest. The issue has generated much discussion from ACCU’s member corporate credit unions. There was concern particularly in regard to the circumstances under which an entire portfolio could be “tainted” by a single sale of a security.

Because of the magnitude of the issues involved, and the need to clarify and give guidance on these important issues, ACCU strongly supports the postponement of the effective date of EITF Issue 03-1 so the matter could be studied further.

Please do not hesitate to call me with any questions you may have.

Very truly yours,

Michael P. Canning, Esq., CAE
Executive Director

Cc: Mr. Eric Kenealy, ACCU Chairman