

From: inknet [mailto:inknet@aol.com]
Sent: Monday, May 13, 2013 6:56 PM
To: Director - FASB
Subject: ALLL CALCULATIONS

FASB Director:

We are a small credit union but we feel the need to send you a comment regarding one of your proposed rule changes.

As mentioned, my credit union is very small - \$1.1 million in assets. In spite of our small size, we offer several valuable services to our members.

The change is not the problem, the problem is changing from a “true” historical calculation to an “assumed, anticipate, expected or whatever you want to call it” – fake, unreal, possible unrealistic calculation. The current calculation has been working great and we see no need to change what is not broken. In addition to the guessing game calculation, this guessing method will also affect our expenses because of our having to fund a possibility.

This rule change will be an unnecessary time-consuming burden and a hardship on our two-person credit union.

We are already looking to the previous calculation and assigning a calculation value based on that. We constantly review our delinquencies and to guess on what we think our possible loss would be would not make any sense. We have true figures to go by so it is not necessary to guess.

There is no benefit seen in this change, only an added burden to our staff, expenses, members, future members and new services (yes new services, because the guessing will take funds and not allow us to afford any new services).

Sincerely,
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