

From: Sabrina Miguez [mailto:miguez09@sbcglobal.net]
Sent: Tuesday, May 14, 2013 12:26 PM
To: Director - FASB
Subject: 825-15

FASB Director;

I do appreciate the opportunity to comment on a proposed rule change.

My credit union is very small - \$17 million in assets, but we offer a wide arrange of financial services to our membership.

Our Credit Union is currently funding by Calculating historical loss, a percentage of the area's unemployment and a percentage of current delinquencies. The later two, were recently put in place by a Document of Resolution that we received which called us to add additional funding to the account due to the current economic state of America.

A change is not my concern, but I am concerned that changing from a true historical and what is calculation to a "expected" model will create a "GUESSING GAME!" That each credit union will develop their own "guessing method" and we will all be expensing additional provisional funds that will take from capital contributions, tighten lending ability that will be unnecessary – because of a future guessing game.

A rule change like this will apply to all size financial institutions and will be a unnecessary burden of time, which of course is a payroll/staff burden.

We already look to the past and assign a calculated value. We review the current delinquency and "guess" on what we think our potential loss is. Then this proposal would have us calculate the "expected" future loss! Past, present, future of the present status....

I just do not see how this change could be anything but a burden to staff, financials, members, and future member services.

Sincerely,

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