

WASHINGTON, D.C. 20456

June 4, 1990

Mr. Brian Witt, Esq.
Waggoner, Farleigh, Wada,
 Georgeff & Witt, P.C.
121 S.W. Morrison, Suite 1000
Portland, Oregon 97204-3192

Re: Uninsured Share Program (Your January 3, 1990,

Letter)

Dear Mr. Witt:

You have asked whether Marion and Polk Schools Credit Union's proposed uninsured share program is legally permissible. On April 26, 1990, the NCUA Board issued a proposed rule that would prohibit uninsured membership shares as a condition of federal insurance. Attached is a copy of the proposed rule. We look forward to your comments.

Sincerely,

HATTIE M. ULAN

Associate General Counsel

Little Milling

GC/MM:sg SSIC 8010 90-0106A

Ud IV. Part C. Elnswarce Coverage