

August 19, 1992

Anthony M. Figlio
Director of Legal Services
Eastern Financial Federal Credit Union
P.O. Box 028532
Miami, FL 33102

Re: Regular Share Accounts (Your August 7, 1992, Letter)

Dear Mr. Figlio:

You asked whether a potential member can establish membership in your federal credit union (FCU) by depositing one share (or the first installment thereon) in any type of share account offered by your FCU, regardless of whether or not your FCU offers a regular share account.

As noted in your letter, we have previously stated that "an FCU is not required to offer a regular share account in order to establish membership in the credit union." We stated further that "... a share, for purposes of establishing membership in the FCU, may be held in an account other than a regular share account, such as a share certificate or share draft account." See November 16, 1990 letter to Robert Bascom of the New York Credit Union League (the Bascom letter), enclosed. An FCU can determine which type(s) of account the initial share is to be placed in for membership purposes as well as whether or not a regular share account is to be offered. This is in line with the Bascom letter.

Sincerely,

Hattie M. Ulan
Associate General Counsel

Enclosure

GC/HMU:sg
SSIC 3501
92-0828