

August 19, 1992

Chris A. Barker, Esq.
Trimmier, Atchison and Hayley, P.C.
P.O. Box 3085
Tallahassee, FL 32315

Re: Electronic Income Tax Filing (Your August 5, 1992, Letter)

Dear Mr. Barker:

You have asked if a credit union service organization (CUSO) must abide by the cost reimbursement restrictions that a federal credit union (FCU) is subject to when engaging in electronic income tax filing services. The cost reimbursement restrictions are found in Part 721 of the NCUA Rules and Regulations (12 CFR Part 721). Part 721 is applicable to FCUs only; it does not apply to CUSOs. An FCU that has made a loan to or investment in a CUSO must comply with the provisions of Section 701.27 of the Rules and Regulations. Section 701.27 does not include a cost reimbursement restriction.

Sincerely,

Hattie M. Ulan
Associate General Counsel

GC/HMU:bhs
SSIC 3600
92-0829