

May 15, 2000

John C. Rasmus, Manager  
Senior Federal Administrative Counsel  
Regulatory and Trust Affairs  
American Bankers Association  
1120 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Re: Eligibility of Administaff Employees for Credit Union Membership.

Dear Mr. Rasmus:

You have asked us to review the eligibility of Administaff Inc. (Administaff) employees and clients to join PT&T Federal Credit Union (PT&T). The employees of Administaff were added to the field of membership of PT&T in the early 1990s. As you know, all current and future employees of Administaff are eligible for membership in PT&T due to the grandfather provision in the Credit Union Membership Access Act. 12 U.S.C. §1759(c)(1).

As far as the corporate clients of Administaff are concerned, we agree with you that Administaff and its corporate clients are not one and the same for the purpose of determining eligible employees for membership in PT&T. The employees of these corporations that do not work for Administaff must go through the multiple group expansion process if PT&T wishes to serve the group. Our understanding is that these separate corporate clients and their employees, who are not employed by Administaff, have not been added to the field of membership of PT&T. Also, our understanding is that PT&T is applying to convert to a state charter, so you may wish to raise any future field of membership issues with the state regulator once the conversion becomes effective.

Sincerely,

Robert M. Fenner  
General Counsel

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