

To Whom It May Concern:

I am writing to you regarding Our Family Social Credit Union, located in Omaha, Nebraska. We are a very small credit union, with total assets of \$521,036.26, as of November 30, 2013.

I am the president of the Board of Directors, and I have served in some capacity for more than thirty years. At our Board meeting on December 21, we reviewed the NCUA's proposed rule regarding home-based credit unions. Let it suffice to say that, if this rule is passed, and if it then applies to OFSCU, it will likely mean the end of our credit union.

While we are a small credit union, we have existed for 63 years since our charter was granted on June 26, 1950. We are, as far as we know, the only family credit union in America. Every member of our credit union is related; we are all cousins. The CBS show, "Sunday Morning," found this to be a fascinating story and featured our credit union in a segment on its show last spring.

We currently have almost 500 members, all cousins, living in more than twenty states. While we may be small, we have been a life-saver to countless cousins, as we have made over 1000 loans to cousins totaling more than \$6,000,000.00 since 1950. We know that many of our borrowers would not have been granted loans without us, as the amount was too small or the credit rating too low. However, being family, we made the loans, and the members made good on them, as our history shows.

We have been a home-based credit union since our inception. I served as Manager from 1990-2000, and the office was in my house. The credit union paid me a monthly rent expense of first \$400 and later \$500 per month. That is the only "income" I received, as that was all our credit union could afford. We currently pay our Manager \$775 per month for housing our credit union office at her house.

If we were suddenly required to rent an outside office to conduct our business, that rent expense (and all the related expenses) would eat up all the revenue we currently devote to dividends. We simply could not afford

those costs. Equally important is that every Manager we have had over the 63 years has performed the Manager's duty while working full time in some other capacity. I have been a teacher for 40 years. I managed the credit union at night and on the weekends, just as the current Manager does. Being able to work late into the night until 2:00 or 3:00 a.m. is the only way we can complete all the necessary work. Often I would get up early at 3:00 a.m. to work on the credit union. This schedule would be impossible if we were required to move the office out of the house and into an office.

If the rule does pass, then we would ask that OFSCU be exempted from the rule, since we are a state-chartered credit union in Nebraska. The examiners from the Nebraska Department of Banking have never complained about any of our various home offices during their examinations over the years. We read through the list of concerns federal examiners have expressed, and not one of those applies to us.

It would be unfair to change the rules for all home-based credit unions, just because a few are guilty of providing unsafe or substandard conditions. It seems far more appropriate to let the NE Dept of Banking determine which state-chartered credit unions, if any, have presented any dangers or health hazards to examiners, and then they could require those credit unions to improve the conditions, or be forced to end their home-based operations.

On behalf of generations of cousins who have depended on Our Family Social Credit Union for their financial needs, we urge you to not pass the proposed rule to end home-based credit unions. At the very least, if the rule does pass, we urge you to exempt OFSCU specifically, or apply this rule only to federal credit unions, exempting state-chartered credit unions, leaving the matter to state Banking Departments to determine at the state level. Thank you in advance for your serious consideration of our requests.

Sincerely,

David Cain
President, Board of Directors
Our Family Social Credit Union