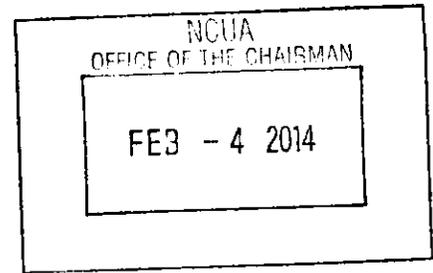




# N.J.T. Employees Federal Credit Union

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JANUARY 28, 2014

TO THE DIRECTORS OF THE BOARD OF NCUA,

RE: THE PROPOSAL TO ELIMINATE THE HOME OFFICE AT SMALL CREDIT UNION

1. TO PROTECT THE SAFETY OF THE EXAMINERS, I HAVE BEEN THE TREASURER OF MY CREDIT UNION FOR 40 YEARS. I HAVE NEVER READ ONE ARTICLE CONCERNING AN EXAMINER HAVING A PROBLEM AT ANY HOME OFFICE CREDIT UNION. THIS SOUNDS LIKE A RULE TO APPEASE THE EXAMINERS OR JUST ANOTHER WAY TO ELIMINATE THE SMALL CREDIT UNIONS. THE COST TO RENT OFFICE SPACE IN THE NORTHEAST WOULD BE AROUND 5 TIMES WHAT IT COSTS TO HAVE A HOME OFFICE. THIS WOULD MEAN DIVIDENDS TO OUR MEMBERS WOULD HAVE TO GO DOWN, AS COSTS WOULD SKY ROCKET.
2. AS A SMALL CREDIT UNION, ALL OF OUR BUSINESS WITH OUR MEMBERS IS DONE IN THE MEMBERS WORK LOCATIONS. WE GO TO OUR MEMBERS; THE MEMBERS DO NOT COME TO US. MOST OF OUR MEMBERS LIVE AND WORK ACROSS NORTH JERSEY. TO PAY FOR OFFICE SPACE JUST TO MEET WITH THE FEDERAL EXAMINER ONCE A YEAR WOULD BE A TOTAL WASTE OF OUR FINANCIALS RESOURCES. YOU THEN ASK US TO STORE ALL OF OUR RECORDS OFF SITE, THIS FOR A CREDIT UNION THAT IS ONLY OPEN ONE DAY A WEEK FOR 8 HOURS. IF YOU WANT TO ELIMINATE SMALL CREDIT UNIONS JUST PASS THESE RULES AND WATCH OUR MEMBERS GO OVER TO THE BANKING INDUSTRY.
3. THE ARTICLE IN THE NCUA REPORT CLAIMS THERE ARE 79 FEDERAL CREDIT UNIONS LEFT, I WOULD NOT BE SURPRISED IF MOST OF THEM ARE NOT IN THE NORTHEAST, AND I KNOW WE HAVE AT LEAST 7 IN OUR COMPANY WITH HOME OFFICES. ALL OF THESE CREDIT UNIONS WERE ESTABLISHED BY THE LABOR UNIONS AROUND THE STATE OF NJ; WE COULD NOT GET TOGETHER IF WE WANTED TOO. I CAN SEE MANY OF US BEING ELIMINATED BY THIS PROPOSAL. I THINK YOU NEED TO RETHINK THESE PROPOSALS, I DO NOT SEE THE COST BENEFIT TO THE CREDIT UNION MOVEMENT OR ANY BENEFIT TO THE MEMBERS OF THE SMALL CREDIT UNIONS.
4. OVER THE YEARS, I HAVE WATCHED NCUA PASS RULES EFFECTING SMALL CREDIT UNIONS THAT IN EFFECT HAVE RESULTED IN THESE SMALLER CREDIT UNIONS BEING ELIMINATED. IF WE ARE ONLY 1% OF CREDIT UNIONS AS THE CHAIRMAN WRITES, WHY ARE YOU PASSING RULES FOR ALL OF US? IF YOU HAVE PROBLEMS WITH A CREDIT UNION HANDLE THAT PROBLEM BETWEEN NCUA AND THAT CREDIT UNION NOT HIT ALL OF US WITH THE SAME AXE.
5. THE CHAIRMAN TALKS ABOUT FRAUD IN SMALL CREDIT UNIONS, FROM READING THE EMAILS YOU SEND OUT IT LOOKS LIKE YOU HAVE AS MUCH FRAUD IN THE LARGER CREDIT UNIONS WITH OFFICES IF NOT MORE. ONLY HONEST PEOPLE DO NOT COMMIT FRAUD HAVING AN OFFICE DOES NOT CHANGE THAT.
6. THE CHAIRMAN TALKS ABOUT CONFLICTS OF INTEREST FOR CREDIT UNION OFFICIALS WHO HAVE HOME OFFICES; SHE SITES A COUPLE OF CASES, WHICH MAKES IT SOUND AS IF WE ARE ALL LINING OUR POCKETS WITH RENT MONEY.

I REMAIN,  
  
LOUIS E SNEYERS

TREASURER / MANAGER