

From: [Bob Peterson](#)
To: [Regulatory Comments](#)
Subject: Bob Peterson Comments on Proposed Interagency Policy Statement Establishing Joint Standards For Assessing the Diversity Policies and Practices of Regulated Entities
Date: Thursday, February 06, 2014 4:30:12 PM



February 4, 2014

Mr. Gerald Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Dear Mr. Poliquin:

This letter responds to the proposal regarding measurement of diversity among credit unions and adopting joint standards relating to that. One Source FCU is a small (\$89 million) credit union in El Paso, TX. Although relatively small, we necessarily deal with a significant number of vendors and strategic partners. In fact, our size actually dictates that we adopt more partners because of the resources to provide key services internally.

The proposal to require credit unions to evaluate our vendors' diversity weighs especially heavily on credit unions who are already overly burdened by our regulatory environment. It would not only create more regulation of us, but would effectively place us in a position to be a regulator of our partners. Many of those partners are not regulated now, so we would become the instruments of their indoctrination.

As I see it, a number of things could result from this proposal if it is implemented:

1. We would be forced to take this on internally, thereby necessarily adding to our cost of doing business
2. Some of our key smaller vendors would reject this requirement and discontinue doing business with us, thereby forcing us to search for other (possibly more expensive) partners
3. We would be forced to pool resources with other credit unions in order to afford this onerous new requirement. This would probably result in the creation of CUSO's, inviting more regulation by your administration.
4. Credit unions would be powerless to confirm compliance by our partners and we would therefore be in a no-win situation in case of their non-compliance
5. Posting our diversity activities and/or qualifications would inevitably invite spurious lawsuits akin to the ATM debacle that we have just resolved after much pain.

As you can see, my biggest concern is the addition of one or more additional layers of regulation to our already-stretched load. I encourage and implore you to re-consider this

proposal, at least as it impacts we in the “smaller” credit union community. Although we are certainly committed to diversity, administration of that diversity should end with our own organizations, not extend to those over whom we have no authority and certainly no control.

I welcome any questions you may have about my input to this proposal. Please feel free to contact me at the number below or by e-mail as indicated.

Respectfully,

Bob Peterson
President & CEO
One Source Federal Credit Union
915-791-4601
bpeterson@onesourcefcu.coop

Bob Peterson, CCUE, CFSP
President & CEO
One Source FCU
915-791-4601

Confidential: This e-mail and any files transmitted with it are the property of One Source Federal Credit Union and/or its affiliates, are confidential, and are intended solely for the use of the individual or entity to whom this e-mail is addressed. If you are not one of the named recipients or otherwise have reason to believe that you have received this message in error, please notify the sender at 915-592-0223 and delete this message immediately from your computer. Any other use, retention, dissemination forwarding, printing or copying of this e-mail is strictly prohibited.
