

From: [Tony Ward](#)
To: [Regulatory Comments](#)
Subject: Anthony Ward-Comments on Notice of Proposed Rulemaking Regarding Associational Common Bond
Date: Friday, February 05, 2016 3:41:31 PM
Importance: High

February 5, 2016

Gerard S. Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428

Dear Sir:

I wish to express my concern for any further change that would allow credit unions an even greater advantage in the financial market place. That would include changing in any way the determination of what is a rural area or local community. In addition any change that would allow for a path that makes it easier for the addition of membership groups should not be allowed. The definition of service facility should also not be allowed to be changed. It appears obvious that all of the proposed changes are directed at expanding the customer base of existing and over reaching credit union institutions. Congressional intent for credit unions was to have them remain small and provide financial services to specific groups that would lack access otherwise. It is clear that the intent of Congress and reality are not the same. Additionally, any change that would cause increased tax subsidies should flat out be rejected. Credit unions that offer broad services and to a broad customer base should be taxed the same as banks.

Sincerely,

Anthony L. Ward
President
CentreBank
765-294-2228 x316
NMLS#780815