

From: [larry.cain](#)
To: [Regulatory Comments](#)
Subject: Larry Cain - Comments on Notice of Proposed Rulemaking for Part 701
Date: Thursday, December 26, 2013 10:17:52 PM

Dear NCUA Board of Directors,

I am writing you as a member of the Board of Directors of Our Family Social Credit Union. I am sharing my concerns regarding your proposal to require all credit unions that operate from a home to move to an office location. Our credit union is currently based out of my home. My wife, Sue Cain, is the Manager. Operating from our home is vital to our family credit union.

Just as our name implies we are literally a family. All members of our credit union are related. Our relatives created our credit union back in 1950 out of a desire to help each other. Our family has greatly benefitted in many ways by having our credit union. Our extended family has a bond unlike many other families. Every other year we build our 4 day family reunion around the credit union annual meeting. Our membership is just over 500. We have as many as 200 attend our annual meeting functions. I know of no other credit union that has close to 40 % of their membership at annual meeting functions. We personally know every member.

To put things in perspective we cannot afford the monthly office rental fees. Our budget is much too small to handle such expenses. Since we are all one family we charge no fees for anything in our credit union. We do, however, have two phone lines in our home. We have the capability to have a dedicated phone line and a dedicated email address and fax number. We can easily accommodate any communication channels needed to operate in a secure and professional manner.

Regarding the safety concerns of the examiners we have never had any issues with our examinations. In 63 years our credit union based home has never had any pets on the premises. Thus, we have never had any issues with violent pets or allergies related to pets. In 63 years we have never had examiners climb up or down steps in our homes. The visits have always been conducted at the same dining room table we have our Board of Director meetings and Supervisory audits. We have always made sure a bathroom was available. We have always treated examiners with utmost respect and courtesy. The examiners have never communicated any concerns with our exam accommodations.

Through the examinations we have shown that all necessary security measures have been taken. We meet all requirements of proper due diligence and safety in record keeping. We have two computers. We take pride in the fact that our actual credit union computer has the ultimate precaution from hackers. It is not hooked up to the internet. I honestly feel every security concern you have conveyed is a potential security concern at any credit union no matter where their office is located.

Our extended family relies on our credit union. We would certainly fragment without it.

We have touted to our members that we are open 24 hours a day 7 days a week. We take calls for loans and conduct business on Holidays. Whenever a family member is in need we are accessible. That would greatly diminish if we started working office hours. We would only have access to our records and file cabinets when we were at the office. Our accessibility would go from 144 hours a week to 40 hours a week. Currently out

turnaround time on loan requests is very short. For example, when we get a call in the evening for a loan we get all the necessary facts, check the members history, and contact the Credit Committee chairperson at home on that same evening. That process could not happen until the following business day if we needed to work out of an office.

There are so many ways are current operations would be altered and diminished. In all likelihood we would probably dissolve. I ask that you please reconsider the current proposal. I do not feel the safety and record keeping concerns you have conveyed pertain to our credit union. If it was necessary to meet our examiners off site, we could easily accommodate that request.

We are a state chartered credit union. My understanding is that the proposal currently does not include state chartered credit unions. I am still writing you because I believe the proposal should not be approved even for federal chartered credit unions. Thank you for allowing me to share my concerns.

Respectfully,
Larry Cain
Correspondence Secretary, Board of Directors
Our Family Social Credit Union