

December 23, 2013

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

RE: Comments on Proposed Rulemaking for Part 701

Dear Gerald Poliquin,

I am writing on behalf of Cal Poly Federal Credit Union which serves the students, staff and faculty of the California State Polytechnic University, Pomona. We have nearly 3,000 Members and \$11 million in assets. Barbara A Bean appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule directed at home-based federal credit unions, Requirements for Contacts with Federal Credit Unions.

I do not support the proposed requirement that meetings between an FCU and NCUA staff occur only at an FCU's offices (excluding homes or residential locations). I believe the members of the credit union should decide if they need and can afford an office. I do not believe NCUA should mandate it.

I work in a small credit union and trying to hold a meeting/exam outside of our office would not work. The amount of paperwork that is examined is huge. To put that all together and carry it back and forth to some alternative location on a daily basis during an exam would simply not work -- we are talking -- 3-4 bankers boxes of files going back and forth on a daily basis.

The proposal specifies that any home-based FCU official that meets with NCUA staff at an alternative public location must deliver all necessary records to that location. I know the kinds of materials that NCUA staff examine and it contains much personal and private account information. In addition, the materials contain information of a confidential information for the credit union's vendors, financial records, staff payroll records. These are not records that should be examined in a public library or hotel conference room. They would have to be transported back and forth each day to the credit union.

I believe a credit union should maintain its own email address which is monitored on a regular basis. I do not believe a credit union should be required to spend money on a separate phone number.

I do not support the requirement that credit unions operate out of office. The concerns of cost and convenience come to my mind first off. If the credit union operates effectively out of a home, that is their decision -- not NCUAs.

If NCUA passes this rule, I believe two years is not enough time for a small credit union to plan, budget, find space and move. I believe five years is a more acceptable time frame.

I do NOT support the requirement to store records in a commercial site. If records have been kept in a home, then they should continue to be stored in the home.

If this rule is not made final and FCU's are permitted to continue operating from home-based locations, I believe current records preservation requirements under Part 749 are adequate.

I do not believe this rule should be for FCUs -- I certainly do not support making SFICUs follow it.

I do not believe NCUA should pass this rule -- I understand it is inconvenient and probably a bit messy performing an exam in someone's home -- but, I believe the practice should continue.

Thank you for the opportunity to comment and for considering our views on the proposed Requirements for Contacts with Federal Credit Unions as they apply to home-based federal credit unions.

Sincerely,

Barbara Bean
CEO
Cal Poly FCU

cc: CCUL