

**From:** [S.Clark](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Scott Clark - Comments on Notice of Proposed Rulemaking for Part 701  
**Date:** Tuesday, December 31, 2013 9:44:44 AM

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To whom it may concern -

I have been made aware of a proposed new regulation, which will make it impossible for the Credit Union, that I am a member of, to do business.

Our credit union is one of a kind. It is a family run CU, with family as members. We have a long and rich history of supporting one and other through this Credit Union, and we have even been featured on National TV and in numerous news stories, both for our uniqueness and professionalism. The CU has always been run out of a family members home, and our record with examiners is excellent.

While I appreciate the concerns brought to light by this proposal, and cannot blame someone for wanting to feel safe while performing their job, it seems that you are taking a broad approach to an issue that could be addressed with much more specific actions. Namely, deal with the actual problem(s), instead of making everyone the problem.

If you have places that are deemed unsafe, issue a warning to those people so that they can address the issues (or not), and move on from there. It is no different than issuing them a warning or advice on a financial aspect of the CU business, is it? Bring the issue to light, allow them the opportunity to address it, and if it continues to be a problem, proceed with actions and fines, up to and including them losing their ability to continue business.

I would ask that you leave the CU's, that are professionally run out of safe and welcoming homes, alone, and reject this proposal in favor of finding another way to deal with an isolated problem. The alternative is to destroy the hopes, dreams, and lives of the countless number of people who rely on these small CU's.

Thank you for your time

Scott Clark