

From: Brian1nyc@aol.com
To: [Regulatory Comments](#)
Subject: Brian Gately, Comments on NPRM Part 701 Credit Union Contacts
Date: Thursday, January 16, 2014 9:43:11 PM

Dear NCUA,

I am commenting about the Notice of Proposed Rulemaking, "Requirements for Contacts with Federal Credit Unions."

I believe that this proposed rule is not necessary because:

- If examiners and supervisory examiners operate out of their homes and have sensitive data there, why is not all right for credit unions to also do the same, as they have for decades?
- The proposed rule is written as much from the point of view of the examiners' welfare as from a safety and soundness aspect. Why do examiners need a higher level of "safety" than other civil service people, such as letter carriers, inspectors, and law enforcement people? It's a bit ironic that the "safety" of the credit union member is scarcely part of the discussion.
- Chairman Matz, in her YouTube video <http://www.youtube.com/watch?v=6peKsvGf1Yk> on tips for writing effective comments says: "*Our goal is to impose the least possible burden on credit unions, especially smaller credit unions*". This proposed rule does not seem to be consistent with her statement.
- I worked for NCUA for 16 years, retiring as a Supervisory Examiner. I worked in a lot of house jobs. (Credit unions based in someone's home.) The worst that happened to me in all those years is that once a lady, CEO of a small credit union in Ohio, said she had to go walk the picket line and could I feed her 3 year old? I managed.

I hope you find these comments helpful.

Sincerely,

Brian Gately

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