

B. I. FEDERAL CREDIT UNION
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January 23, 2014

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

RE: Requirements for Contacts with Federal Credit Unions

Dear Mr. Poliquin:

The board of directors, volunteers and staff of B. I. Federal Credit Union strongly urge the NCUA to reconsider implementing its proposed regulation regarding home-based credit unions. We appreciate this opportunity to comment on the NCUA proposal on contacts with federal credit unions. However, a significant outcome of the proposed rule would require our credit union, and many like ours, to move from our current home-based operation to a commercial location. While we appreciate NCUA's concerns for overall safety and soundness, we oppose the proposal to force our credit union to move into commercial office space for the following reasons:

- 1) Our credit union has been in existence since 1948 as a home-based credit union and, during that entire time, in our judgment, we have done our best to meet the financial needs of our members.
- 2) Our current net worth is over \$4.8 million. Over the years our credit union has worked hard to control expenses while continuing to provide our members the best possible service.
- 3) During examination cycles we have always maintained a clean, safe and healthy working environment for our own staff and for visiting NCUA staff, and have never received any complaints.
- 4) We have a dedicated phone and fax machine line, email address and website.
- 5) We keep all credit union records safe and secure and we have never had any supervisory problems in any of these areas in the past.

Based on the forgoing, we maintain that our credit union's history demonstrates that we pose no safety and soundness threat as a home-based credit union.

We have significant concerns that your proposal will needlessly force our credit union to incur an unwarranted and substantial increase in operating expenses to satisfy the rule. One advantage we have as a home-based credit union is minimal expenses for fixed assets such as a building or lease expenses. Moving out of our current location into some type of retail or similar space will have a dramatic impact on our budget should this rule be finalized.

Finally, the proposal states that the Federal Credit Union Act authorizes NCUA to direct conditions under which its employees operate. We do not agree that the Federal Credit Union Act empowers NCUA to compel an FCU to obtain, lease or otherwise occupy any type of office facility. Again, our credit union provides a clean and safe environment for our staff and examiners. If other home-based credit unions do not or cannot provide such an environment, NCUA should apply its supervisory enforcement powers on an individual basis. A blanket mandate prohibiting home-based credit unions is not appropriate.

In summary, we respectfully oppose your proposal to require our credit union to move into commercial office space for two reasons. First, we currently have a healthy net worth and have control over our expenses and are operating in a healthy and safe environment. To require us to rent or lease commercial office space will significantly impact our net worth and could jeopardize the safe and sound operations of our credit union. Second, we do not believe the NCUA has the legal authority under the Federal Credit Union Act to require a credit union to operate in any particular type of office space or working environment. We trust you will consider our comments in good faith, and will ultimately determine not to require our credit union to move into commercial office space.

Very truly yours,

B. I. Federal Credit Union
Board of Directors