

January 23, 2014

Mr. Gerald Poliquin

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

***Re: Notice of Proposed Rulemaking for Part 701
Requirements for Contacts with Federal Credit Unions.***

Dear Mr. Poliquin:

Today, we celebrate our 56th year - over five decades of serving firefighters in Joliet, Illinois. Our credit union has always been there for our members - not only in good times, but more importantly, in the toughest of times when our members need us most. Our products are simple; shares and loans, but our mission is far from simple. We are here to serve our members, and will never forget, not for a moment, why we are here. We have accomplished a great deal in our 56 years and remain steadfast in our focus and promise to improve the lives of our members.

Our foundation is not unlike other credit unions. We are a not-for-profit financial cooperative, chartered to serve our member-owners and governed by a volunteer board elected by the credit union's membership. We follow the credit union Act and rules set forth by our regulator. We plan for tomorrow, and train our board members. We are involved in the community, and promote financial education. We reconcile accounts and keep impeccable records. We recognize that our credit union is not positioned to "do it all" but our credit union is strong, and based on our regulators findings - a safe and sound institution.

Our credit union stands at approximately \$6 million in assets, serving 522 members. Over the last year our quick lending process closed 91 new loans, of our 522 members, 202 have open loans. We are proud to have been the lending choice for a myriad of new firefighters sent off in their first new car. We have conducted countless share transactions, opened sixteen new accounts, and counseled members on the red flags of elder financial abuse. We work hard, often late nights and weekends - but it's worth it because we are serving our members in the way they deserve to be served.

Our credit union is home-based. While the home based model no longer fits the needs of the vast majority of credit unions - it fits us. The proposed rule to mandate a commercial office would lead to our demise, and leave 522 devoid of the credit union they built, and that is unconscionable.

Thank you for the opportunity to comment. We are hopeful that the NCUA will consider the substantial costs and burdens that compliance with the proposed rule will bring small home-based credit unions, and weigh these against the alleged benefits that compliance might provide.

Sincerely,

Robert Surinak

Robert Surinak

Robert Surinak, President
Joliet Firefighters Credit Union