



February 6, 2014

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

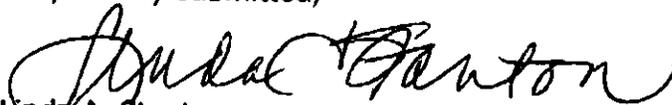
Dear Mr. Poliquin:

I am sending this letter to you to represent the views of Union Pacific of Arkansas Federal Credit Union regarding NCUA's proposal on diversity standards. While UPFCU supports diversity, we cannot support the proposal as drafted. This proposed rule would place significant burden on small credit unions by requiring them to gather diversity information on every supplier, contractor and vendor. This proposal, as currently drafted, could also require us to assess Office Depot or any other large supplier's diversity practices and policies, which is simply unreasonable and does not seem to support the intent of the Dodd-Frank Act.

We have nine full time employees and one part time employee, and it would be next to impossible to commit to a strict diversity inclusion hiring policy. Union Pacific of Arkansas FCU is committed to hiring the most qualified candidate to be able to best serve our members.

Credit unions already face an unprecedented number of regulatory and compliance issues and changes in 2014. We hereby, respectfully encourage the NCUA to create diversity standards that are in line with the EEOC reporting requirements and exempt credit unions that have less than 100 employees from diversity reporting requirements.

Respectfully submitted,



Linda A. Stanton

President/CEO

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