

Gary Tuma, CCUE
President/CEO

February 6, 2014

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

Sent via E-mail to: regcomments@ncua.gov

Re: Proposed Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Regulated Entities

Dear Mr. Poliquin:

I strongly oppose the proposed regulation noted above. In my opinion, this is an example of the "one size" approach that is totally unnecessary for credit unions. Furthermore, it will add substantial expense to the growing costs of compliance and reporting that is stifling credit union growth and long-term viability. This is especially true for smaller credit unions.

I especially find the notion that credit unions develop a means of measuring diversity in their relationships with contractors and suppliers. The vast majority of "contractors and suppliers" used by credit unions have no mandate to report this information. Are credit unions then expected to create this data for every small contractor and/or supplier used?

I am sorry Mr. Poliquin, our organization embraces diversity and supports every aspect of equality however, I cannot see layering on more regulatory burdens on credit unions that will not produce any real, long-term value to those we serve every day, or society as a whole for that matter. I hope that many within the credit union movement will speak out on this issue.

Thank you for your consideration.

Sincerely,



Gary Tuma