

February 7, 2014

Mr. Gerald Poliquin

Secretary of the Board

National Credit Union Administration

1775 Duke Street

Alexandria, VA 2231-3428

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:

This letter will represent the view of First Class American Credit Union. First Class American Credit Union is a credit union located in Fort Worth, Texas serving approximately 6,000 members. Our original membership was the postal employees of north Texas, we now have a community charter that includes Fort Worth, Texas. First Class American Credit Union appreciates the opportunity to comment on this very important pending regulation/policy.

First Class American Credit Union's board and management strongly support diversity. I am in favor of diversity in the workforce and feel that if we do not have diversity in the work place that overtime lack of diversity would lead to our own demise. We must have diversity to adequately serve our diverse credit union memberships. Mandating a level of diversity and mandated levels would not only take away from our ability to adequately concentrate on our safety and soundness issues put would also impede our ability to attract and hire qualified employees.

First Class American Credit Union supports diversity in the work place. However, we do not support the broad language in Dodd-Frank that states that NCUA and other financial institution regulatory agencies to propose standards for assessing diversity policies and practices. This language does not address specific requirement of such standards. In my opinion this proposed regulation/policy is being created to mandate and monitor a diversity problem that does not exist and to further add more regulatory burden to financial institutions that have nothing to do with making our financial institutions safe and sound, nor does it accomplish anything to provide financial services to our credit union members.

To mandate and require the National Credit Union Administration to measure and monitor diversity in the work place would take away from the duties it is charged with, ensuring the sound financial stability of the credit union industry.

For these reasons, First Class American Credit Union would like to encourage this proposed rule/policy not be adopted and implemented.

Thank you for your consideration.

Sincerely,

Nancy M. Croix-Stroud

President/CEO