



PINE BLUFF COTTON BELT FEDERAL CREDIT UNION

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February 3, 2014

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

Re: Pine Bluff Cotton Belt Federal Credit Union's Comments on Proposed Interagency Policy Statement Establishing Joint Standards for Assessing the Diversity Policies and Practices of Regulated Entities

Dear Mr. Poliquin:

This letter represents the views of Pine Bluff Cotton Belt Federal Credit Union regarding the NCUA's proposal on diversity standards. While Pine Bluff Cotton Belt FCU supports diversity, we cannot support the proposal as drafted. It appears the proposed rule would place significant burden on our small credit unions in the requirement to gather diversity information of each supplier and contractor. This proposal, as currently drafted, could require us to assess Office Depot's or other large suppliers' diversity policies, which is simply unreasonable and does not seem to support the intent of the Dodd-Frank Act.

Having only fourteen full-time employees and three part-time employees, it would be next to impossible to commit to a strict diversity inclusion hiring policy. Pine Bluff Cotton Belt FCU is committed to hiring the most qualified candidates to best serve our members.

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

Respectfully submitted,

Greg James
Chief Executive Officer

