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Our members are our Strength

06/27/2014

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

Re: Comments on Notice of Proposed Rulemaking Regarding Associational Common Bond

Dear Mr. Poliquin:

River Valley Community Federal Credit Union, currently operates with a community charter, serving Dallas, Calhoun, Columbia, Ouachita and Union Counties in South Arkansas. Our credit union also has the low income designation.

We support the NCUA's effort to grant automatic qualification for certain groups, especially the associations that work to improve the lives of our low income members. Example: Not for profit food banks and diaper facilities.

However, we have concerns and believe credit unions should be allowed to keep current associations that have and will continue to add value to our members.

Our credit union also holds stock in an Arkansas based CUSO, the restriction on certain kinds of associations could impact indirect lending relationships for as many as 27 credit unions in our state.

It is crucial to work to maintain the integrity of the Credit Union movement and our truly cooperative structure, as society changes credit unions will have to reach out past our narrow business models to serve and bring value to our members.

River Valley CFCU appreciates the effort of the NCUA to create an avenue for associational groups that have been historically automatically approved. However, we remain concerned that the proposed changes and additional requirements will hinder credit unions who wish to reach out with CUSO and associational relationships.

Thank you for the opportunity to communicate our concerns.

Sincerely,

Tammy Passafiume  
President

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