

**From:** [Brian Barkdull](#)  
**To:** [Regulatory Comments](#)  
**Subject:** 12 CFR Part 701 Appendix B  
**Date:** Tuesday, May 27, 2014 6:02:15 PM  
**Attachments:** [image002.png](#)

---

Regarding the proposed rule on the Associational Common Bond Requirements, I support this proposed rule – especially as it pertains to the abuses from indirect lending where many aggressive credit unions pick up membership outside of their FOMs through car dealership purchases. This practice has gotten out of control and needs to be reined in. This clarification from this proposed rule does exactly that.

The only concern that I have is where the word “grandfathered” is used. I would hope that this doesn’t forgive any credit union that is currently opening up membership outside of their FOM.

Sincerely,

*Brian J. Barkdull*

President/CEO  
520-452-3099



NOTICE: This electronic mail message and any files transmitted with it are intended exclusively for the individual or entity to which it is addressed. The message, together with any attachment, may contain confidential and/or privileged information. Any unauthorized review, use, printing, saving, copying, disclosure or distribution is strictly prohibited. If you have received this message in error, please immediately advise the sender by reply email and delete all copies.