

**From:** [Mary Carnarvon LaHousse](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Mary Carnarvon LaHousse, Unified Communities FCU Comments on Notice of Proposed Rulemaking for Part 701, FCU Ownership of Fixed Assets"  
**Date:** Monday, April 20, 2015 12:38:56 PM  
**Attachments:** [image005.png](#)

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Secretary of the Board, Gerard Poliquin,

I am writing on behalf of Unified Communities Federal Credit Union, which serves the communities of Belleville, Sumpter and Van Buren Townships all located in the State of Michigan. We have 3500 Members and \$12,800,000 in assets. Unified Communities FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed rule, Federal Credit Union Ownership of Fixed Assets.

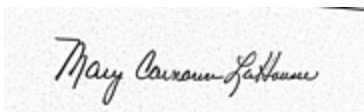
While I support the elimination of the 5% aggregate limit on investments in fixed assets that is currently in place for FCUs with \$1,000,000 or more in assets as well removing the waiver provisions regarding the aggregate limit, I believe there is still room for improvement.

I believe a data processing lease should not be included in the calculation of fixed assets. Under this circumstance the credit union does not own any portion but merely pays for a service.

I also believe the NCUA should allow comments on the proposed guidance, since guidance is very important and can make a difference in how the requirements in the proposal are applied.

In closing, I would like to state that I am happy to see changes to the fixed asset rule as I believe it is outdated and it was time for the NCUA to evaluate the purpose and scope of what the intent of the rule was.

Thank you for the opportunity to comment on this proposed rule and for considering our views on credit union ownership of fixed assets.



Mary Carnarvon LaHousse  
Chief Executive Officer



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