

YOUNG, SHERON

From: _Regulatory Comments
Sent: Tuesday, February 21, 2006 8:57 AM
To: YOUNG, SHERON
Subject: FW: Hardin Community FCU Comments on Proposed Rule Part 701.1

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CUNA was asked to forward the comments of Hardin Community FCU (below) to NCUA:

We are a moderately sized credit union in Ohio. We currently serve a county of 31,500 people and have been in business since 1969. During that time, we have been a SEG Credit Union with 30+ groups and more recently converted to a Community Charter Credit Union in 2001. We have dedicated many years to building a relationship with our members through support of our community, helping members develop their credit, purchase their first home, finance a college education and in many, many more ways. We employ 20 people who all live, work and worship within the boundaries of our community and give countless hours of their personal time to civic, religious and youth oriented activities. As of the 12/31/05 call report we have \$30mil in assets, 7200 members, Net Worth of 9.50% and ROA of over 1.00%.

Several years ago, our county was "cross-chartered" by a Credit Union (Superior Federal) in Lima, Ohio. This credit union truly has no common bond with our Credit Union or our Community in any way. We, as a Board of Directors and Management Team were discouraged by this charter conversion without so much as a word of notice or at the least, a letter or phone call from Superior Credit Union or the NCUA. We realize that this is not required but it should be considered in some form as a formal procedure when "cross-chartering" over another Credit Unions community boundary. This behavior by Credit Unions is not "cooperative" in nature and will contribute to more attacks by Banks because it could possibly lend credence to their argument.

We understand that this Proposed change does not address our concern but urge you to consider these issues in the future. Please consider making stricter rules and regulations concerning Credit Unions chartering over one another and please strongly consider a formal notification procedure. Thank you for your time.

Matthew Jennings
Hardin Community FCU

CC: Doug Clark, President HCFCU & Paul Mercer, OCUS