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STEEL WORKS

Community Federal Credit Union

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March 22, 2006

FAX: 703-518-6319

Mary Rupp
Secretary of the Board
1775 Duke Street
Alexandria, VA 22314

Re: Comments on Proposed Amendments to 701.1 and IRPS 03-1, Chapter 3, Section III.A

Dear Ms. Rupp:

Steel Works Community Federal Credit Union is opposed to NCUA's proposed amendments regarding service to underserved areas.

The first page of the Notice of Proposed Rulemaking NCUA states, *"This proposed rule will ensure continued reliable and efficient service to federal credit union members located in underserved areas."* On the members' behalf, we would certainly hope that statement to be true, but we do not believe that will be the case.

The main office of our credit union is located in the northern panhandle of West Virginia and our geographic field of membership includes Hancock, Brooke, and Ohio Counties in West Virginia; Jefferson County, Ohio; and four other municipalities in West Virginia and Ohio.

In addition, we also currently serve an underserved area in western Washington County, Pennsylvania. The underserved area is predominantly rural and undeveloped raw land with a few very small towns. In this underserved area, there are no multiple common bond credit unions. We believe this may be representative of other areas of the country and we respectfully request that before NCUA adopts this proposed rule, a determination be made as to whether there are multiple common bond credit unions in the underserved areas to provide those services which community chartered credit unions may no longer be able to provide. Or, whether there are multiple common bond credit

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Mary Rupp

Secretary of the NCUA Board

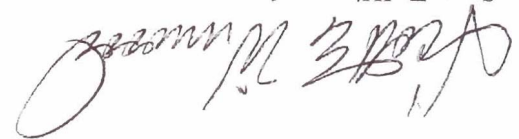
unions willing to undertake these additional underserved areas and the inherent expense of establishing an office as NCUA now proposes to require.

In reality, the people in underserved areas who truly need low-cost, low-fee or no-fee services may not have a multiple common bond credit union available to them, and they will be left to the mercy of banks with high minimum deposit requirements and high fees or to check cashing stores, loan companies, pawn shops, etc.

Congress established the "federal credit union system" to provide financial services to people of modest means. The "system" should include credit unions of all types, not just multiple common bond credit unions. We believe that although the credit union movement is the target, people of modest means, and especially those of less than modest means, are being victimized by the American Bankers Association and that Congress should amend the Federal Credit Union Act to correct this situation.

Thank you for your consideration of our comments.

Sincerely,



Scott E. Winwood
President and CEO