Jordan, Sheron

From:_Regulatory CommentsSent:Monday, April 30, 2007 10:43 AMTo:Jordan, SheronSubject:FW: Jack Ewald's Comments on Proposed Rule 701.3

From: John_Ewald@uhs.org [mailto:John_Ewald@uhs.org]
Sent: Friday, April 27, 2007 10:16 AM
To: _Regulatory Comments
Subject: Jack Ewald's Comments on Proposed Rule 701.3

NCUA:

I'd like to urge far less restrictive access to non-confidential credit union records. At our Credit Union we brag about our transparency, and the fact that Members can view their CU's previous month's financials on the wall at our locations, and that Management is always open to discussing the Credit Union with them, as they are the owners.

Why would we want to restrict Member access to non-confidential records? I guess that when it comes to strategy a larger "community" credit union might have competition infiltrating its "membership" and thus wouldn't want to divulge strategy and tactics to the competition when it acts as a "member," but I'm not sure that really stacks up against the right of any other credit union Member to access records of their own institution.

Lets not enact or "clarify" another rule that emphasizes the divide between Members and their Credit Union (which is comprised of a bunch of Members). Reduce the threshold requirement of this "group" to 1 person. If you won't do that, then at least reduce it from 1%; go for .5%, or 1% or 10 people, whichever is less.

Thanks for your time,

Jack Ewald Chief Executive Officer UHS Employees' Federal Credit Union Phone: (607) 763-5069 Fax: (607) 763-5095 Web: www.uhsefcu.org