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From: Bill Wade [mailto:billw@suntidefcu.com]

Sent: Friday, June 06, 2008 2:56 PM

To: \_Regulatory Comments

Subject: Bill Wade comments on Proposed Rule Part 701.1

I have an underserved area application pending with Region 4 since early March of this year. Since it was not handled in a timely manner, will I now be required to resubmit under the new requirements? If so, this is very important to me.

I have spent the past two days on FDIC, OCC, and NCUA web sites. Nowhere is there any statistical information on services offered in a locality. If I am wrong, please correct me, but in order to comply with this new requirement I will have to go to the quarterly reports for each institution, then determine where each of the branches are, and if any is in this area.

Then determine what services are available at that branch as well as what other services are available from the main location including electronic services. And then produce some sort of 'statistics' based on this information.

It appears clear to me that NCUA does not want small credit unions like ours to serve the underserved at all.

The multi-billion dollar credit unions have already grabbed up the areas they want, as it somehow appears they knew beforehand this was going to happen. (See Randolph Brooks and Security Service FCU's recent approvals.) Before implementing such an onerous requirement, it would seem NCUA would provide clarity on exactly what information is required and how it is to be obtained. It would also be very helpful to let those of us with pending applications know what actions are going to be necessary. If we can obtain and submit the information, or should we resubmit the entire application after the 60 day comment period and however long it takes to implement the new rules, and decide what they really mean.

I now have an expensive new branch in an area I cannot serve. This is due to the fact that the rules under which my application was submitted would allow this underserved area addition to our FOM, and now it seems questionable, as I cannot find information such as you describe on the internet (as the proposed rule indicates.) It would seem appropriate if at least NCUA would put such information on THEIR OWN site before making such a casual comment.

Maybe I can sell it for a loss and then we can merge with one of the big boys.

No, seriously, please offer specifics as to what is required and how it is to be found. I would like to get my application up to requirements so I can use my new branch in the next year or so.

And please, could someone reply?

Thanks,

Bill Wade, CEO

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