

October 30, 2013

The Honorable Debbie Matz, Chairman
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428

Dear Ms. Matz:

The American Bankers Association (ABA) is writing you about GTE Financial of Tampa, Florida. GTE Financial is advertising on its website (see attachment) that anyone can join. The credit union also states “anyone is eligible to join GTE Financial!”

The National Credit Union Administration (NCUA) in September wrote federal credit unions stating that “[i]f your credit union is advertising that anyone, without limitation, is able to become a member of your credit union, then you may be in violation of federal law and regulation.”

Stating that *anyone is eligible to join GTE Financial* indicates this credit union is open to the public without limitation in violation of NCUA’s letter.

ABA requests that NCUA order GTE Financial to cease advertising anyone can join.

Moreover, ABA believes that the credit union is using its own financial club, CUSavers, to circumvent limitations in its field of membership.

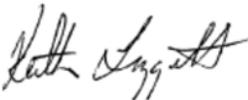
The credit union writes on its website:

“You can join GTE Financial through our non-profit educational financial club, CUSavers. If you share in the desire to reach common financial goals, joining CUSavers for a one-time \$10 membership fee qualifies you for credit union membership. To make joining even easier, we’ll pay your \$10 membership fee!”

ABA does not believe a \$10 membership fee meets the requirement of having a common bond. But what is even more troubling is that the credit union is paying the membership fee to make joining GTE Financial even easier. NCUA should notify the credit union that paying the membership fee for the club is an impermissible practice.

In closing, as ABA becomes aware of other examples of credit unions improperly circumventing field of membership requirements, ABA will notify NCUA of these improprieties.

Sincerely,



Keith Leggett
Vice President & Senior Economist

Attachment

The screenshot displays the GTE Financial website's 'Anyone Can Join' page. At the top, the browser address bar shows the URL <https://www.gtefinancial.org/future-members/join/anyone>. The website header features the GTE Financial logo, a search bar with the text 'What can we help you find?', and navigation links for 'LOGIN Online Banking' and 'Join GTE'. A purple navigation bar contains links for ABOUT, HOME LOANS, AUTO LOANS, PERSONAL, BUSINESS, FOR MEMBERS, FUTURE MEMBERS, RATES, and CONTACT US.

The main content area is titled 'Anyone Can Join' and includes the sub-header 'Anyone is eligible to join GTE Financial!'. Below this, it states 'You can become a member of GTE through one of the following ways:'. The page is divided into three main sections, each with a small image:

- Family Membership:** Family members eligible for membership include the spouse, child, parent, brother, sister, stepparent, stepchild, grandchild, or grandparent of the primary member.
- Your Business Can Apply to Join:** Your business can apply to join as a GTE Financial Community Partner. Companies that become Community Partners can offer membership to their employees as a no-cost benefit. Also take advantage of the business services we offer to employers of all sizes.
- Membership as a Free Employee Benefit:** If you or an immediate family member works for a Community Partner of GTE Financial, you can join!

Below these sections is a 'ZIP Code Eligibility' section, which lists the following zip codes: 33602, 33603, 33604, 33605, 33606, 33607, 33609, 33610, 33619. For more specific areas, it refers to a map.

The bottom section is 'CU Savers', which states: 'You can join GTE Financial through our non-profit educational financial club, CUSavers. If you share in the desire to reach common financial goals, joining CUSavers for a one-time \$10 membership fee qualifies you for credit union membership. To make joining even easier, we'll pay your \$10 membership fee!'.

The browser's taskbar at the bottom shows the system clock as 10:23 AM on 10/8/2013. The Windows taskbar includes icons for the Start menu, Internet Explorer, Google Chrome, and other applications.