Keith J. Leggett
Vice President and Senior Economist
Tel: 202-663-5506
Fax: 202-828-4547
Email: kleggett@aba.com

American Bankers Association

Building Success. Together.

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.
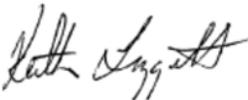
The credit union writes on its website:

> "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