

March 04, 2014

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 Fort Knox Federal Credit Union (Fort Knox).

Fort Knox is allowing anyone to join the credit union through the American Consumer Council (ACC). It appears that it has partnered with ACC for the express purpose of qualifying individuals, who otherwise are ineligible for credit union membership.

Fort Knox is advertising on its website that “[i]f you do not meet any of these eligibility criteria, you may qualify for membership by joining the American Consumer Council --it's free! Call your local branch for more details.”

The addition of individuals through ACC contradicts congressional intent that there needs to be a genuine affiliation between credit union members in order for credit unions to fulfill their public mission.

ABA requests that the National Credit Union Administration order Fort Knox to cease its advertising that allows individuals, who are otherwise ineligible for membership, to join the credit union.

But not only should NCUA prohibit such advertising, NCUA should prohibit such practices that are intended to qualify individuals as members without any meaningful common bond.

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