

March 17, 2016

Ken Bonnot
Director
Division of Credit Unions
P.O. Box 1607
Jefferson City, MO 65102

Via First Class U.S. Mail and Electronic Delivery to cu@cu.mo.gov.

Re: Proposed Rescission of 20 CSR 1100-2.185 Investment in Fixed Assets

Dear Director Bonnot:

On behalf of the 1.453 million credit union members we represent, the Heartland Credit Union Association (HCUA) appreciates the opportunity to comment on the Division's proposal to rescind the rule at 20 CSR 1100-2.185 Investment in Fixed Assets.

We believe that rescinding the rule would provide state chartered credit unions in Missouri with meaningful regulatory relief. Further, rescinding the rule will bring Missouri's requirements for fixed asset investment into parity with requirements for federally chartered credit unions, thus protecting the value of the state charter.

As always, we appreciate the opportunity to review and comment on this issue. We will be happy to respond to any questions regarding these comments.

Sincerely,



Don Cohenour and Marla Marsh
Co-Presidents