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Fred R. Becker, Jr.
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National Association of Federal Credit Unions | www.nafcu.org

June 20, 2013

The Honorable Rob Portman
United States Senate
448 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Portman:

On behalf of the National Association of Federal Credit Unions (NAFCU), the only trade association exclusively representing the interests of our nation's federal credit unions, I write today in support of the efforts of you and your colleagues, Senators Mark Warner and Susan Collins, regarding the *Independent Agency Regulatory Analysis Act of 2013* (S. 1173). The cost-benefit analysis that this legislation calls for would be a good step toward providing our nation's credit unions with the kind of regulatory relief they so desperately need.

Despite acknowledgement from members of Congress on both sides of the aisle that credit unions did not contribute to the financial crisis, the regulatory landscape for credit unions has been in constant flux in recent years. This includes subjecting the entire industry to the rulemaking authority of the Consumer Financial Protection Bureau (CFPB). While the problem is not necessarily any one regulation, the cumulative effect of new regulations piled on top of each other without a study of the impact on small financial institutions can be devastating to credit unions that don't have an army of compliance attorneys at their disposal.

As non-profit entities that exist to serve only their members, every new regulation imposed on credit unions by the CFPB, the National Credit Union Administration (NCUA), or the numerous other regulatory agencies results in increased loan rates and fees, decreased savings rates, and curtailed financial services provided to 95 million credit union members. It is with this in mind that NAFCU supports authorizing the Administration to require independent agencies to perform a cost-benefit analysis prior to issuance of any new regulation, and ensure alternatives to a proposed rule are considered.

The idea of an increased focus on cost-benefit analysis falls in line with NAFCU's five-point plan on regulatory relief (attached), shared with you and your colleagues on February 12th of this year. Among the many ideas presented in NAFCU's plan is a cost-benefit provision that seeks the same objective of improving the cost-benefit analysis of new regulations that your legislation calls for. We look forward to working with you and your staff to further advance the idea of improved emphasis on cost-benefit analysis of regulations.

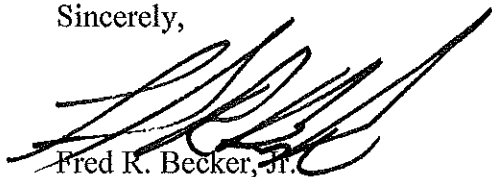
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Thank you for your leadership on this important matter. If we can answer any questions or provide additional information on this matter, please do not hesitate to contact me or NAFCU's Vice President of Legislative Affairs, Brad Thaler, at 703-842-2204 or bthaler@nafcu.org.

Sincerely,



Fred R. Becker, Jr.
President and CEO

cc: The Honorable Mark Warner
The Honorable Susan Collins

*Thank you for your
strong leadership
on this important
issue!*