



NATIONAL CREDIT UNION ADMINISTRATION

WASHINGTON, D.C. 20456

January 29, 1991

Gary Greenwald
Reichelt, Nussbaum, Brown, Dukes & LaPlaca
P.O. Box 627
Greenbelt, MD 20768-0627

Re: Regulation B (Your November 30, 1990, Letter)

Dear Mr. Greenwald:

You have asked whether a federal credit union (FCU) may initiate a program in which it offers the following services to its members who are 50 years or older who have direct deposit or maintain a minimum balance in a savings or certificate account:

- * free checks
- * free money orders
- * free travelers checks
- * free stop-payment requests
- * postage-paid envelopes for mail transactions
- * one year membership in the National Association for Retired Credit Union People

You ask specifically whether such a program would violate the Equal Credit Opportunity Act (ECOA) or Regulation B.

The ECOA and Reg B prohibit discrimination in extensions of credit on a number of bases, including age. Since the proposed services do not represent extensions of credit, we agree with you that the program would not violate either the ECOA or Reg B. We express no opinion, however, on whether this program is in compliance with or may violate any other Federal or state law.

Sincerely,

Hattie M. Ulan
Associate General Counsel

GC/LH:sg
SSIC 3228
90-1206

FOIA Vol. III, B, 10, Reg