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Public Comments on Overhead Transfer Rate Methodology: =====

Title: Overhead Transfer Rate Methodology

FR Document Number: 2016-01626

RIN:

Publish Date: 1/27/2016 12:00:00 AM

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Comment: Subject: OTR Methodology

The formula that we think is being used appears to favor Federally Chartered CU's more and creates an inequity in the chartering - fairness of Fed vs State Charter. The issue of clarity and transparently communicating with all CU's appears to be an issue NCUA should consider when addressing this and all issues.

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