

Section 3- It should be made clear that the fee of five dollars is not to the superintendent of banks, but to the office itself.

Section 9 (f)- A maximum dividend allowance of 10% appears to me to be needlessly high for this type of institution in view of the other benefits available to members.

Sections 10 and 22- I would make a larger requirement for the accumulation of surplus or guarantee funds and provide that the maximum interest rate on loans should be automatically reduced, say ultimately to 6%, on a sliding scale as the surplus is built up.

Section 15 (c)- Why limit deposit to banks in New York State and why exclude all state banks?

The law, I believe, should make possible the organization of unions with unlimited liability wherever the co-operators so desire. You will find a brief discussion of this point on pages 10-12 of the enclosed paper which I read before the recent annual meeting of the New York State Agricultural Society in Albany.

Possibly these points have all been considered by you and there may be good reasons ^{with which I am not familiar} for the provisions in these matters contained in the bill as you have drafted it.

Very truly yours,

E. V. Keenan

EWK/J