

From: [Brenda Conner](#)
To: [Regulatory Comments](#)
Subject: 12 CFR Part 701 Chartering and Field of Membership for Federal Credit Unions
Date: Thursday, September 27, 2012 3:48:43 PM

NATIONAL CREDIT UNION ADMINISTRATION

12 CFR Part 701

RIN 3133-AE02

Chartering and Field of Membership Manual for Federal Credit Unions

In response to: Proposed rule with request for comments –

NCUA Board;

Thank you for taking on the topic of re-defining the “Rural District”, an effort which may allow for more community credit unions to use the rural district charter.

We appreciate the thought and consideration that obviously was necessary to determine a viable process; specifically establishing the 3% of total state population limit verses a numerical limit (fixed ceiling) that would be hard to determine and, as noted, “attempt to fit all circumstances”.

The proposed definition of a “Rural District” will allow community credit unions to serve more counties that really need and deserve credit union membership access. In our case the population density of less than 100 and the limit set at no more than 3% of the state’s population will give us greater opportunity to serve.

Sincerely,

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VP Special Projects

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