

From: [Beverley Rutherford](#)
To: [Regulatory Comments](#)
Subject: VACU Comments on Notice of Proposed Rulemaking Regarding Associational Common Bond
Date: Tuesday, June 24, 2014 3:34:58 PM

Thank you for the opportunity to comment on your proposal to amend NCUA's chartering and field of membership rules related to associational common bond requirements. I am responding on behalf of a state chartered credit union located in Virginia with over \$2.5 billion in assets and 230,000 members.

We support NCUA's goal to streamline the approval process and agree with the proposed automatic approval of certain associations, such as alumni associations or homeowner's associations to federal credit unions (FCUs) field of membership that meet certain requirements. While we are not federally chartered, positive changes like this for federal credit unions may impact our ability to efficiently add groups with our regulators as well.

While we recognize NCUA's objective to prevent credit unions from creating associations strictly to increase membership opportunities, we believe there are other enforcement options available to NCUA rather than establishing a regulation to enforce this issue. Further, we oppose NCUA's threshold requirement that would require an association to have been operating as an organization independent from the requesting FCU for at least one year prior to the request to add the group to the FCUs field of membership. We do not believe there is a rational basis for this requirement, and would delay members from enjoying the benefits of credit union membership unnecessarily. Lastly, we question "geographical proximity" that remains a requirement for adding groups. In today's environment and the ability to service members through electronic means, we believe the time is appropriate to re-evaluate this requirement.

We appreciate the opportunity to provide comments on this proposed rulemaking. Please feel free to contact me with any questions.

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