

From: [Jim Lumpkin](#)
To: [Regulatory Comments](#)
Subject: Chartering and Field of Membership Manual
Date: Thursday, November 19, 2015 4:30:11 PM

Dear Secretary of the Board Poliquin,

The National Credit Union Administration is to be applauded for its proposal to ease the membership burdens facing federal credit unions. Current membership rules are outdated, artificially limiting access to credit unions. Consumers deserve choice on where they obtain financial services and credit unions should be easily available to all Americans in all communities. This is especially important for communities where banks do not provide service to people of modest means, like credit unions strive to do.

The proposal you are considering is a step in the right direction toward making sure that credit unions can fully serve their communities. The proposed changes will greatly enhance the ability of federal credit unions to serve their members and the communities in which they operate and quite possibly save some of them the time and expense of converting to a state charter where FOM rules, at least in the NW, are more conducive to growth.

Sincerely,

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