

From: [Keary Miller](#)
To: [Regulatory Comments](#)
Subject: Chartering and Field of Membership Manual
Date: Wednesday, December 16, 2015 6:20:07 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 Current membership rules are outdated, artificially limiting access to credit unions.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. These changes should give federal credit unions additional flexibility in determining areas and people to serve that are not available in the current regulation.

The proposed rule would amend the Chartering and Field of Membership Manual making revisions to the agency's Field of Membership (FOM) rules. Because credit unions are only open to certain segments of the population, as required by the Federal Credit Union Act (FCUA), NCUA is tasked with promulgating regulations that determine who credit unions can have as members.

This proposal would benefit our membership opportunities greatly and will allow credit unions to reach and help more families in America.

Sincerely,

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