

From: [Barry Swanson](#)
To: [Regulatory Comments](#)
Subject: Comments on Proposed Rule, Appendix B of Part 701 - Chartering and Fields of Membership
Date: Tuesday, December 15, 2015 12:50:05 PM

Dear Secretary of the Board Poliquin,

I am writing today in full support of the proposed changes the National Credit Union Administration (NCUA) is recommending to the Chartering and Field of Membership rules. My credit union, Seasons Federal Credit Union, will greatly benefit when the new rules go into effect. Seasons FCU will finally have the opportunity to apply for a reasonable charter expansion and have the application be decided on the merits of the credit union versus instantly denied because of some antiquated and nonsensical rules about Core Based Statistical Areas.

I understand that when the last changes to the Chartering and Field of Membership rules were made, it was done so in an effort to streamline the process and make things easier. That was not the end result and I applaud NCUA for recognizing the rules were cumbersome to some credit unions and prohibited some successful credit unions from responsible expansion. The proposed changes provide more flexibility for credit unions, such as mine, to expand in a way that makes sense for the credit union and for the consumers who become potential members.

Please pass the proposed changes as soon as possible so my credit union is given a fair opportunity to expand.

Sincerely,

Barry Swanson
1 Walnut Tree Rd
Cromwell, CT 06416