

From: [Doug Wolf](#)
To: [Regulatory Comments](#)
Subject: Comments on Proposed Rule, Appendix B of Part 701 - Chartering and Fields of Membership
Date: Tuesday, December 22, 2015 5:30:07 PM

Dear Secretary of the Board Poliquin,

I wish to thank the Board of the National Credit Union Administration for taking up the challenge to modernize the current unnecessarily restrictive Filed of Membership rules. I have been working within the credit union movement for over 30 years and have held many positions that have included NCUA Examiner, credit union executive, and credit union consulting.

As the Board knows, field of membership restrictions were put into place over 75 years ago when personally knowing your borrower was essential to sound lending decisions. This reasoning is no longer a valid argument, however, removing field of membership restrictions is not within the NCUA's ability as it would take an act of congress to change the Federal Credit Union Act. The Board's current proposal is a very good, sound step in the right direction to modernize this restriction of membership and allow more Americans the freedom of choice in the financial institution they receive services from.

I am in strong support of the Board's proposed rule change, especially in connection with allowing community-based credit unions outside of metropolitan statistical areas (rural counties) to not be so restricted by an arbitrary population statistic. The change raising the rural district population limit to 1 million or using congressional districts are welcomed changes that will undoubtedly open up credit union services to Americans who otherwise would not receive the benefit of choice in a cooperative form of financial institution.

As the Board considers the comments on this rule change, I would ask that the Board be careful when considering comments in opposition to the rule change since the only logical reason for opposition is to restrict competition and to deny Americans the freedom of choice in services.

Again, I thank the Board for this opportunity to comment and I strongly urge the Board to move forward with the improvements in the Filed of Membership rules.

Sincerely,

Douglas C. Wolf
14445 Memorywood Dr
Baxter, MN 56425