

December 11, 2015

National Credit Union Administration
Gerald Poliquin, Secretary of the Board
1775 Duke Street
Alexandria, VA 22314-3428

RE: Comments on Notice of Proposed Rulemaking for Field of Membership - RIN: 3133-AE31

Dear Gerald Poliquin,

The National Credit Union Administration Board (NCUA) is proposing to amend part 701 of its rules and regulations to make revisions to the agency's chartering and field of membership manual. I am writing on behalf of State College FCU, which serves multiple common bonds in the State College, PA area to express support for NCUA's proposed field of membership rule.

Our credit union supports NCUA's proposed FOM changes in the following areas: including SEG contractors in a multiple common bond credit union, as well as office/industrial park tenants that have potential members of 3-5000.

Such changes in this proposed rule would make it easier for our smallish credit union to engage many more potential members, who would learn of and be eligible to utilize our favorable products and services to better their personal financial lives. Such changes also give the "little guys" more of a fighting chance to compete with banks and even very large credit unions in our immediate area.

Thank you for the opportunity to comment on this proposed rule and for considering our views on Field of Membership. We urge the agency to approve a final rule soon so that credit unions can take advantage of the regulatory relief and field of membership flexibility in the proposed rule.

Sincerely,

Terry Shoemaker
Chief Executive Officer
State College FCU

cc: CUNA, CCUL