

December 17, 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,

I appreciate the opportunity to comment on the proposal to better define the limits on the field of membership question, which has been vague for too long and a pain point for many credit unions.

Although I agree with most items in the proposed rule especially in expanding the population within a rural area, which has been underserved for too long, and the inclusion of an office or industrial park, which has both geographic and occupational connections, I take issue with several proposed inclusions.

The idea of considering past military service as a common bond is ludicrous. If you allow past military service as criteria for a common bond, every other organization could make a case for the same. If you were a Boy Scout once in your life or a Rotary member, would this now be considered a commonality. I agree that active military share a common bond and I believe in the concept of "once a member always a member". Therefore, if you join a credit union while serving in active duty, I do not have a problem with continuing your membership once you are no longer active. However, to expand this concept, to allow past military to enroll in a credit union, would open up the argument that other organizations should be able to do the same. I do not believe that this would be in the best interest of credit unions.

I also disagree with allowing political districts to be considered as a common bond. These districts have been so skewed for political reasons in order to elect a certain party's candidate, that they no longer share any form of commonality.

Thank you for considering my input in making your final regulation.

Sincerely,

Arthur Kremer
President/CEO
Sharefax CU Inc

cc: CUNA, CCUL