

**From:** [John Barad](#)  
**To:** [Regulatory Comments](#)  
**Subject:** John Barad Comments on Notice of Proposed Rulemaking Regarding Associational Common Bond  
**Date:** Friday, December 18, 2015 1:00:26 PM

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Secretary Poliquin:

I am writing today on behalf of Union Square Credit Union and to express support for the National Credit Union Administration's (NCUA) proposed field of membership (FOM) rule. Prior to November 6, 2015, our credit union's FOM was limited to those living and/or working in Wichita County, Texas. Primarily due to NCUA's historically restrictive FOM rules and proven unwillingness to deviate from those rules, our members voted to convert our credit union's charter from Federal to State of Texas – effective August 1, 2015 – and, subsequently apply for (and have approved by the Texas Credit Union Department) a FOM expansion which now includes the counties of Archer, Baylor, Clay, Wichita and Wilbarger Counties, Texas and Cotton and Tillman Counties, Oklahoma. We certainly anticipate expanding the area we serve will have a positive impact on this credit union.

Credit unions definitely need more opportunity to expand their membership base. Please move forward quickly with this regulation change.

John G. Barad  
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