

From: [Carl Ratcliff](#)
To: [Regulatory Comments](#)
Subject: Proposed FOM Rule
Date: Tuesday, December 29, 2015 10:56:38 AM

December 29, 2015

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

RE: Comments – Proposed Rule: Chartering and Field of Membership Manual, 12 CFR Part 701

Dear Mr. Poliquin:

I would like to commend the NCUA Board for their reconsideration of the rules governing Chartering and Field of Membership for Federal Credit Unions.

In 2003 ABNB converted from a multiple common bond charter to a community common bond charter serving Isle of Wight and Southampton Counties, Virginia, along with the independent cities of Franklin, Chesapeake, Norfolk, Portsmouth, Suffolk and Virginia Beach, Virginia.

In 2006 ABNB's charter was expanded to include Currituck County in North Carolina using standards and parameters currently in effect after three previous attempts to add communities adjacent to ABNB's existing field of membership were denied.

It does not make sense that, though the Census Bureau recognizes the interactive nature of the Combined Statistical Area (CSA) as a well-defined community we have been denied the ability to expand to serve this community.

It appears that our long term struggle that has required numerous the pages of documentation and hours spent to obtain NCUA approval to serve what we have always viewed as our local community may soon draw to a close.

I also believe NCUA should remove the population cap when defining communities for field of membership purposes. The determination as to whether or not an area qualifies as a well-defined community should be made exclusively other more appropriate government agencies. The agencies that define a CSA do so based on economic and social interaction not on population numbers so there is no justification for the arbitrary population cap currently imposed by NCUA.

Another issue that in my opinion is beyond explanation is the failure to recognize the relationships many community credit unions have with not for profit associations and charitable organizations that serve the community. Why Community and TIP credit unions have been denied the ability to include members of such organizations within their field of membership makes no sense whatsoever yet SEG based credit unions are permitted to include them.

On the positive side, the proposed rule represents a quantum improvement over current field of membership restrictions and should prove beneficial for all charter types. NCUA could be even more progressive in the field of membership arena with this proposal. The chartering rules for a number of states are much more progressive and have been successfully defended from attacks from for profit financial service providers.

Thank you for the opportunity to comment. I look forward to positive action by the Board and respectfully urge them to consider the points that I have made on behalf of ABNB others will benefit from this proposal.

Sincerely,

M. C. Ratcliff
President/CEO

cc: NAFCU
CUNA
VCUL

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