

January 13, 2016

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 West Virginia Central Credit Union, which serves select employee groups, to express support for NCUA's proposed field of membership rule.

West Virginia Central Credit Union supports all proposed FOM changes.

Credit unions have historically been restricted as to who can become a member, which has limited financial access to consumers needing and wishing for credit union membership. We believe that FOM requirements should be changed to allow significant expansion of our membership.

The WV state charter does not allow the flexibility offered by many other states. As a state chartered credit union, we would like to be able to consider changing to a federal charter if our option for an expanded community also allowed us to continue to serve our current SEG groups. This would include the ability to serve all current members as well as current and future employees of those groups that have not joined the credit union as of yet. Employees are greatly benefited by the option of credit union membership and should be able to join at their convenience.

We also feel that changes to the current FOM regulation should include expansion of CBSA, increased population limits and the use of congressional districts as well defined local communities. The process to determine an underserved area should be developed to assure that all communities have access to low cost - high quality financial services.

West Virginia Central Credit Union believes that restrictions to credit union membership has a dire affect on American consumers. All consumers should have the ability to choose either for-profit banking or not-for-profit financial cooperatives.

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,

Michael Tucker
President/CEO
WV Central Credit Union

cc: CUNA, CCUL

