



December 10, 2015

Dear Secretary of the Board Poliquin,

With regards to the NCUA's recent Field of Membership proposals, Kentucky's Credit Unions generally applaud the effort of the NCUA to provide consumers (both members and non-members) access to competitively price financial products, for its citizens across the Commonwealth. There's little doubt some regulatory relief, namely the "relaxing" of a number of provisions within appendix B, of Part 701, will increase the possibilities of non-members becoming members, in a number of different ways.

- (1) The potential subdivision of cross-sections of Core Base Statistical Areas and Metropolitan Districts, in order to better realistically characterize an area a credit union can reasonably service, provides more clarity (and protection), for the credit union's ability to serve;
- (2) Servicing an adjacent/bordering area, or an entire Congressional District, are now permissible provided the CU's marketing and business plans display a commitment to servicing the new areas.

Further expansions of the definitions of "Rural District", and "Underserved Areas," and "Multiple Common Bonds," also expand potential member access to credit unions; thus, favorably add greater value to federal charter. Changes proposed to "Other persons eligible for Credit Union Membership",



as well as to the “TIP” charter definition are also viewed very favorably by our member credit unions.

In summation, our members feel there are many positives in the proposed changes to the current field of membership regulation. Any effort to streamline regulatory burden, as well as allowing more people the ability to have more financial choices, is viewed very favorably among our member credit unions. While we have no recommendations for change in the proposal, we ask that should the NCUA consider any amendments, that those changes be as objective in nature, excluding as much subjectivity as possible.

On behalf of Kentucky’s Credit Unions, thank you for asking our thoughts on this proposal. This amendment to the regulation will only help bring more and better financial choices to our credit union members!

A handwritten signature in black ink, appearing to read "Wendell Lyons". The signature is fluid and cursive, with a long horizontal stroke at the end.

Wendell Lyons

President

Kentucky Credit Union League

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