

January 12, 2016

Gerard S. Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Subject: Comments on Notice of Proposed Rulemaking Regarding Associational Common Bond

Dear Secretary Poliquin:

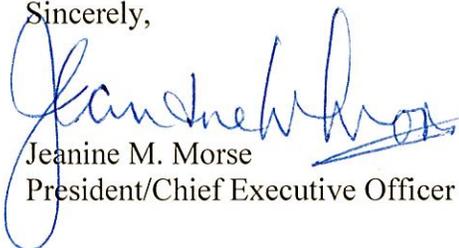
On behalf of the University of Hawaii'i Federal Credit Union and its 29,000 members, I strongly support the proposed changes to NCUA's Field of Membership regulations. As a multiple common bond charter, the proposed amendments are a significant improvement over the existing regulations. Specifically:

1. **"Reasonable Proximity" through Members' Online Access to Services** – This requirement modifying the definition of "service facility" to include a transactional website or mobile platform is a welcome change as the financial services environment transitions from physical branches to online services.
2. **Inclusion of Select Employee Group Contractors in a Multiple Common Bond** – Including the ability to add persons who work regularly for an entity that is under contract for any select employee group will provide more flexibility in providing financial services to these individuals.
3. **Inclusion of Office or Industrial Park Tenants in a Multiple Common Bond** – We strongly support the additional flexibility in adding all tenants in an office or industrial park in lieu of listing each tenant separately.

In today's competitive financial services market, the proposed amendments would allow our credit union the flexibility to further expand our membership, seek out consumers who need affordable financial services and reduce costs associated with expansion.

I appreciate the opportunity to comment on the proposed regulation. If you have any questions, please contact me at (808) 983-5500 or via email at jmorse@uhfcu.com.

Sincerely,


Jeanine M. Morse
President/Chief Executive Officer