

January 20, 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 the Ohio Credit Union League, which serves Ohio's credit unions to express support for NCUA's proposed field of membership rule.

Credit unions were created under the philosophy of people helping people, communities coming together to help their neighbors. As communities evolve and morph, so too does the definition. Defining a "community" used to be easy – people who work together, live in the same neighborhood, or attend the same church or school. But in today's increasingly interconnected world most of us are becoming a part of multiple diverse communities, at times even communities that are separated geographically. The current rules result in credit unions turning away potential members, merely because they live across an artificial boundary drawn on a map, even if people living on both sides of that boundary work together and interact on a daily basis. This revised rule will allow credit unions to expand their field of membership across these invisible lines to new communities, which will enable access to quality financial services for all consumers. Allowing for new segments of the population to experience the benefit of credit unions and expanding services to traditionally underserved areas of the community.

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,

Kimberly Stewart  
Manager of Public Relations  
Ohio Credit Union League

cc: CUNA, CCUL