

**From:** [Emily Spall](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Comments on Proposed Rulemaking for Chartering and FOM  
**Date:** Monday, February 01, 2016 1:00:07 PM

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Dear Secretary of the Board Poliquin,

On behalf of Oregonians Credit Union, I am writing to you regarding the National Credit Union Administration's (NCUA) proposed rule amending the Chartering and Field of Membership (FOM) Manual, incorporated as Appendix B to part 701.

The National Credit Union Association's proposed rule reforming the Field of Membership regulations is much appreciated. These rules have not been updated in some time and are no longer adequately serving the credit union industry. In fact, they are limiting member service and our ability to serve our communities and select employee groups. The number of federally chartered credit unions has been decreasing over the last several years and the restrictive field of membership rules play a large part in that trend. Bringing some common sense changes to the rules to bring them into current times makes a lot of sense and we support the NCUA's efforts in this regard.

This proposal represents a modernized approach to keep pace with changes in state laws, technology, and the financial services industry. By providing more avenues for community charters to grow, the proposal will not only increase consumer choice in the marketplace but it will also increase access to affordable financial services.

Thank you very much for the opportunity to comment on this proposed regulation.

Sincerely,

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