

January 28, 2016

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

Re: Comments on Proposed Rule: 12 CFR Part 701 "Chartering and Field of Membership Manual"

Mr. Poliquin,

Let me first provide my background which supports my comments to follow. I have been involved in the credit union movement since 1970. I have served in all Board of Director positions over a 24 year span. I have served as a federal credit union President & CEO for 19 years. During those 43 years and continuing to this date, I have been actively involved in multiple trade organizations and continue to serve on credit union boards and committees. Outside of the credit union movement, I continue to be actively involved in Chambers of Commerce, business organizations, and specific support organizations for FINANCIAL LITERACY.

CORE AREA SERVICE REQUIREMENT – NCUA should NOT impose additional layers that would restrict credit unions from serving communities that want and require the services of a financial institution that only exists to serve those citizens.

POPULATION LIMITS – Population limits are from the old school of identifying communities. Credit unions should be allowed to serve a COMMUNITY, not one based on a CORE BASED STATISTICAL AREA or CBSA. While I could elaborate on the number of regulations that include numerical numbers, let credit unions serve an area defined by the populous not CBSA.

COMBINED STATISTICAL AREA – As expressed above, let credit unions serve a community not based on any governmental declared number.

CONGRESSIONAL DISTRICT – While Well-Defined Local Community (WDLC) designations can generally be seen as Congressional Districts, that's not always true. Maryland is the extreme example of grotesquely gerrymandered electoral districts, and while the current Governor, Larry Hogan is working to establish an independent commission to correct this situation, NCUA should consider allowing Congressional Districts to be used.

OFFICE, MALLS AND INDUSTRIAL PARK TENANTS – There is certainly a common bond that exists within shopping malls and office/industrial park tenants. This includes hours, security, SNOW REMOVAL, amenditees, and human resources. These locations should be considered as a single SEG.

REASONABLE PROXIMITY E.G. "SERVICE FACILITIES" – A personal hot bottom !!!!! NCUA's unwritten 25 mile proximity when out when ATM machines that accepted requests for withdrawals and provided withdrawals were accepted as "service facilities". With "share branching" and ATM's reasonable proximity should be considered something of the past!!!!

TRADE, INDUSTRY OR PROFESSION (TIP) – While the concept makes sense, our credit union was a telephone based credit union. We applied for a TIP to be a "utility" TIP with the understanding that telephone, electric, television, communication (internet), gas, oil, etc. were all consideration to be utility, but were denied. NCUA needs to understand the definition of UTILITY !

While there are many other factors to be considered in the Field of Membership revisions, these are ones I thing should be considered!

Respectfully submitted,

Richard T. Webb
CREDIT UNION MEMBER
Retired Credit Union Member Board of Director
Active Credit Union Member of Supervisory Committee
and Member Appeals Committee
Board Member of Credit Union Trade Organization
Trade Organizations Committee Member
Former Board Member of Trade Organization
AND, just a plain citizen seeking financial stability