

February 04, 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 Central FL Postal CU, which serves Postal and Federal employees and Postal customers to express support for NCUA's proposed field of membership rule.

CUNA has advocated for 10 million, which is approximately the population of the largest single political jurisdiction that NCUA has approved. This seems logical to us.

Congressional districts are a well-defined local community.

Under the current regulation, when a credit union seeks to serve an underserved area, NCUA calculates a proposed area's concentration of facilities ratio to meet a statutory requirement that a proposed area be underserved by other depository institutions. What other alternative methods can NCUA use to identify underserved areas?

I also support the inclusion of office and industrial park tenants in a multiple common bond.

Credit unions should be allowed to solicit for groups between 3,000 and 5,000 members to join and include in their FoM.

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,

James Weibert
President/CEO
Central Florida Postal CU

cc: CUNA, CCUL