

February 06, 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 Sun Federal Credit Union, which has a multiple common bond designation (serving primarily the petroleum refining industry) to express support for NCUA's proposed field of membership rule.

As a FCU with a multiple common bond designation, we find the current Field of Membership (FOM) rules restrict our ability to serve those who are in need of fair, common sense financial services. The regulatory requirements of the industry are increasing with each passing year, making it more difficult to operate and thrive as a small financial institution.

Credit unions nationwide are looking for ways to stay compliant as well as relevant. In order to accomplish this we need to gain from economies of scale. We do this through mergers and expanding our field of membership. We are driven by compliance and competition to make sure that we are making every effort to fight for more than just survival as we are currently doing, but rather for prosperity that has proved to be mutually beneficial for both our credit union and the members that we are afforded the opportunity to serve. It has never been a better time to take fresh look at the merger application process, as well as revise the current FOM rules to allow for more participation in the cooperative movement.

While operating under a multiple common bond designation the efforts to include contractors of select employee groups and allowing for inclusion of industrial park tenants would allow us to expand our reach to prospective members who have been denied qualification in the past. Increasing the population limit for rural districts from 250,000 to 1 million would allow for even more capacity to impact lives within the community.

In summary we support the initiatives set for by the NCUA to expand the FOM rules to fit the landscape of the modern era. Prolonged restrictions on the cooperative movement's expansion efforts will keep us from gaining economies of scale, and in time render us obsolete. By loosening the grip on who we are allowed to extend our services to will only strengthen the middle class and in turn our country. We cannot let this be overlooked.

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,

Justin Brickner
Investment Administration Accountant
Sun Federal Credit Union

cc: CUNA, CCUL