Western
FEDERAL CREDIT UNION

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February 5, 2016

Mr. Gerald Poliquin
Secretary of Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

RE: Proposed Rule Amendments to Appendix B of Part 701, Chartering and Field of Membership Manual

Dear Secretary Poliquin,

On behalf of Western Federal Credit Union Members, Board of Directors and the Executive Management Team, I am writing to you regarding the National Credit Union Administration's proposed rule amending the Chartering and Field of Membership Manual, Appendix B of Part 701. We commend NCUA for recognizing the need for Field of Membership reform and we agree that the rules no longer adequately serve the credit union industry. At Western we continue to follow the long-standing credit union motto of "people helping people," operating not for profit, not for charity, but for service. We believe everyone should have the opportunity to join a credit union and are hopeful that this legislation can begin to remove certain limitations within the FOM rules to allow this to occur. Below are the proposed changes to the Charter Manual that we wholeheartedly support along with additional comments for consideration.

Reasonable Proximity through Members' Online Access to Services

Western strongly supports the expansion of the definition of "Service Facility" of this proposal. This would allow Western and others to serve select groups and members through technological avenues without the large expense of a building, allowing for the savings to be passed to the membership by continuing to offer lower cost financial services. Credit Union members can continue to form bonds and be integrally related regardless of geographic location due to progressive financial technology on which individuals can connect from anywhere in the world. Potential members should not be penalized for embracing the financial technology offered, and federal credit unions should not be penalized for adopting the use of these technologies to serve and grow their memberships.

Streamlined Determination of Stand-Alone Feasibility of Groups Greater than 3,000
We strongly support the intent of this proposal, to streamline application process so that groups of members would only need to submit a statement that conditions exist that result in the group being unable to form their own credit union, yet we do not feel that the appropriate threshold has been set. We believe this threshold number needs to be set higher to attempt to offer CU services to all. While we know this is moving in the right direction, it is not enough.

Honorably Discharged Veterans
Western strongly supports this change to include "Honorable Discharged Veterans" who deserve the same credit union services as other military groups.

SEG Contractors
Western supports the proposal acknowledging that there is no distinction between a single and multiple common bond credit unions in this area. We agree to extend to multiple occupational common bond credit unions the ability to add individuals who regularly work for an entity that is under contract to the sponsor of the SEG listed in its charter, so long as the contractor has a "strong dependency relationship" with the sponsor.

Office/Industrial Park Tenants
Western supports the initiative to allow multi-SEG credit unions to serve the employees of an office or industrial park tenant. Similar to the inclusion on SEG contractors, this proposed amendment will allow multi-SEG credit unions to reach potential members who want and need affordable financial services.

We appreciate the opportunity to comment on this proposed regulation and would like to thank the agency for your hard work to positively provide much-needed relief for the federal credit union industry. While Western strongly supports this proposal, we hope additional changes can be made to assist with future sustainability of credit unions. We encourage the agency to remain vigilant in protecting members' opportunities to receive low cost financial services and their ability to join a credit union.

Sincerely,

Suzanne Parolisi
Compliance Manager
Western Federal Credit Union