



February 6, 2016

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

Delivered electronically to regcomments@ncua.gov

Subject: Field of Membership; RIN 3133-AE50

Dear Mr. Poliquin,

Thank-you for the opportunity to offer comments on the National Credit Union Administration's (NCUA) Field of Membership (FOM) proposal. I appreciate the NCUA board and staff efforts to review and update regulations to keep the credit union charter relevant and the National Credit Union Share Insurance Fund (Fund) safe in today's challenging regulatory environment.

As a federally chartered credit, Pacific NW FCU is very supportive of the FOM proposal under consideration. We believe the federal side of the dual-charter nature of credit unions has struggled to remain a competitive option in light of the progressive state charters in the Northwest. This FOM proposal will help keep the federal charter relevant in this changing environment. After reading this proposal I'm encouraged that our regulators have listened to input from federally chartered credit union and are taking a significant step away from the litigation-averse stance of the past fifteen years in evaluating FOM expansion requests.

I appreciate the willingness of Chair Matz and the NCUA board to tackle this tough issue and would like to offer my thoughts on the rule as it is proposed:

1. The willingness of the NCUA to expand beyond census tract definitions will give PNWFCU an opportunity to consider a community charter. The existing FOM community charter restrictions wouldn't allow us to convert to a community charter and continue to serve Hood River County, in which we have a full-service branch and are only one of two credit unions present.

2. The streamlined process for approving groups between 3,000 and 5,000 is also an encouraging step in the right direction. *I recommend considering a higher threshold as it would be very difficult to start a new credit union with only a 2,500-member base, given the difficulty in meeting capital and regulatory requirements.*
3. The ability to serve all employees in an Industrial Park/Shopping Mall/Office Complexes without having to add each tenant is also a great tool for PNWFCU. Our main branch is in a primarily light industrial section of town. We are surrounded by Industrial Parks. At present we have gone door-to-door to add businesses. This will greatly enhance our ability to serve this area. Many of the employees of this section of town are underbanked. PNWFCU is making a concentrated effort to serve these folks. We are actively engaged in moving them from merely cashing their weekly paycheck with us to establishing a financial relationship with the credit union, fulfilling our goal to be our members' financial partners for life.
4. Finally, this entire proposal signals a significant shift in the NCUA's approach to FOM expansions. It indicates a desire to provide credit unions with the opportunity to reach out to more people with our services. I look forward to this shift from a more litigation-averse decision making process and will be interested to see how this is promoted to all levels of the NCUA. I can already attest to the willingness to review FOM requests in our recent addition of an association that didn't fit into the auto-approval buckets that exist right now. Director Robert Leonard was very helpful in this process.

I would like to finally thank Deputy Director Matt Biliouris for allowing me and other credit union officials the opportunity to provide input and feedback in this process through multiple conference calls.

Conclusion

I would like to reiterate that I support the field of membership proposal as presented. I look forward to the discussion and analysis that will result from the comment process in shaping the final rule. I appreciate the opportunity to offer my input.

Respectfully,

A handwritten signature in black ink that reads "Thomas E. Griffith". The signature is written in a cursive, flowing style.

Thomas E. Griffith
CEO