

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 NCUA Board has proposed 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 ABNB Federal Credit Union, which serves residents of South Eastern Virginia and South Eastern North Carolina and to express support for NCUA's proposed field of membership rule.

As a community credit union we are proud to serve residents of our community. Unfortunately our charter as currently defined does not permit ABNB to serve a number of mostly rural communities adjacent to our metropolitan statistical area. The rural areas surrounding our field of membership have relatively small populations that are generally not attractive to larger institutions. This limits the choice of institutions that residents can do business with. At the present time we have two offices in adjacent communities that serve ABNB members but we are not allowed to serve our neighbors at these locations.

I believe it is imperative that community credit unions be given flexibility to provide choice to individuals who live or conduct business where they provide service to existing members of the credit union regardless of the size of the group or the population. It is not uncommon for a credit union to have a service facility outside its primary field of membership.

Expanding the geographic boundaries for community credit unions like ABNB will enable us to expand service to citizens in outlying areas that are already recognized as part of the retail and service areas of Greater Hampton Roads.

In addition to expanding the geographic area I believe the Board should consider allowing community based credit unions to include members of not for profit organizations within their community to become members of the credit union. It really doesn't make sense that a SEG based credit union can include a not for profit in their field of membership (regardless of where the non profit exists) but a community credit union cannot. What exemplifies a common bond better than a community based credit union that serves a community based not for profit organization.

Looking at chartering in general, it is inconsistent that an Associational, TIP or SEG common bond credit union can incorporate any employment group regardless of the geography or size/population yet a rural district or CSA/CBSA is restricted based on population size. There is nothing in the statute that dictates the size of the group that can share a common bond.

Going forward, for credit unions to prosper NCUA must be open to adapting and taking advantage of the flexibility the Federal Credit Union Act provides. Our ability to serve should not continue to be defined by our competition or by the few bad actors within our own house.

Thank you for the opportunity to comment on this proposed rule and for considering our views on Field of Membership. I 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,

Millard Ratcliff
President/CEO
ABNB Federal Credit Union

cc: CUNA, CCUL