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February 1, 2016

Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Via Email: regcomments@ncua.gov

RE: PROPOSED REGULATIONS – CHARTERING AND FIELD OF MEMBERSHIP
MANUAL- 12CFR PART 701

Dear Mr. Poliquin:

On behalf of our 19,000 members, the Board of Directors, management and staff of First Financial Federal Credit Union, I would like to take this opportunity to comment on the proposed regulation to 12 CFR PART 701 of the Chartering and Field of Membership Manual.

Our credit union is a community chartered credit union and supports the following:

- To eliminate the requirement that a CBSA must contain a “core” area. We serve different communities that do not necessarily contain a defined core area even though they do encompass a community with a strong economic bond.
- The use of Combined Statistical Areas
- To allow credit unions to serve a contiguous area outside of a CBSA, CSA, SPJ or rural district
- To allow Community chartered credit unions to use Congressional districts as a WDLC

The proposed rule is a positive step for credit unions, and the NCUA Board should continue evaluating the credit union charter and go even further within the statute – which can certainly be done.

Thank you for the opportunity to comment on this proposed rule and for considering our input on the proposed regulation to 12 CFR PART 701 of the Chartering and Field of Membership Manual.

Sincerely,

Issa Stephan

Issa E. Stephan, CCUE, CUERME
President & CEO