

From: [Jim Veneskey](#)
To: [Regulatory Comments](#)
Subject: Chartering and Field of Membership Manual
Date: Monday, February 08, 2016 2:30:09 PM

Dear Secretary of the Board Poliquin,

I would like to thank NCUA for considering changes to the Chartering and Field of Membership manual. I fully support changes to rules that would allow more people in my community to join my credit union. I appreciate the efforts that the National Credit Union Administration is taking to make it easier for credit unions to serve more Americans. I hope you will finalize your proposal as soon as possible.

Given the quality of services that can now be provided via electronic means, it makes sense to expand the definition of a facility to include electronic and mobile access for all types of charters. In a rural area such as the one where I live, electronic access may be the only viable option to receive financial services in some small towns.

I also agree with the recommendation to include political districts as a way of evaluating a community as these districts typically represent a common interest and bond. Streamlining the process to approve these well defined areas makes sense from a practical standpoint. I know of a case where an employee at another credit union outside our current field of membership was interested in moving her student loan to a credit union within our Chapter but was unable to find a credit union in the chapter that she both qualified for as a member and that offered that product.

I also applaud the idea of allowing an area adjacent to a defined community to be considered as part of that defined community, for field of membership purposes. In looking at the area where I live, as an example, we have two small cities (with populations between 10,000 and 15,000 each) divided by a river and a state line where the cities share multiple resources including a common chamber of commerce. A number of our employees live in the neighboring state and I'm sure the majority of businesses in these two cities have employees and customers from both cities. From a marketing perspective, we would use the same channels to reach residents in both cities.

Although it doesn't directly impact my credit union at this time, it doesn't make sense to me for a credit union to be forced to give up a portion of their membership should they want to change the type of charter they operate under or if they inherit another credit union's field of membership from a merger.

I would like to thank you for providing me with the opportunity to express my thoughts and opinions and am excited about the prospect of being able to serve a greater number of potential members.

Sincerely,

Jim Veneskey
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