

February 08, 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,

February 5, 2016

Mr. Gerard Poliquin

Secretary to the NCUA Board

1775 Duke Street

Alexandria, VA 22314

RE: Comment Letter to the Proposed Amendments to NCUA's Field of Membership and
Chartering Manual 12 CFR Part 1

Dear Mr. Poliquin:

On behalf of the Board and membership of Barksdale Federal Credit Union, I would like to commend the NCUA Board for reviewing and updating the current FOM rules. Any relief from the current regulation is welcome news.

Though presently it does not affect Barksdale FCU, we support removing the Core Area Service requirement as presented in the proposal. We are a little confused about the 2.5MM cap in combined statistical areas and see that as somewhat arbitrary, but we welcome the ability to serve an outside area contiguous to an existing CBSA or single political jurisdiction.

We feel that the Concentration of Facilities Test is poor and onerous tool for determining an underserved status and we are disappointed that this provision was not reformed. Using the determination by CDFI as justification that an area is underserved makes much more sense.

We welcome the revised definition of “service facility” for SEG expansion, but at the same time feel that it should be applied to underserved area expansions as well.

Finally, we are disappointed that there was no inclusion of relief from current merger FOM constraints in this proposal and feel in the present climate within the credit union movement is a glaring oversight. We hope that there is some thought of addressing this area in the near future.

Overall we applaud NCUA's overall intent with this reform, but feel it still offers less relief than the current laws allow.

Sincerely,

Rod Taylor

President/CEO

Barksdale Federal Credit Union

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Rod Taylor
President/CEO
Barksdale FCU

cc: CUNA, CCUL