

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,

I am writing in general support of the the proposed field of membership rule.

I have a fundamental belief that historic limitations on member eligibility are a relic of an analog era where initial borrower risk could only be determined by proximity and less by performance analytics. That time has long since expired and the Board is commended for continued unwinding of its outdated safety and soundness tools.

Credit unions, by delegated member authority, should determine their membership. The NCUA Board's authority, as the intent of this proposed rule recognizes, should remain limited to the safety and soundness of the institution.

In the spirit of this belief, I am concerned about the 2.5 million limitation for a given CSA. The proposed rule is undoubtedly a step in the right direction. I recognize the challenge of defining a community but replacing one arbitrary number with another won't fix the obvious geographic inequities that will certainly arise. If the Board feels a fixed number is necessary, one that is high enough to encompass the largest potential populations would mitigate those inequities from region to region.

Though some improvements should be made, I support this proposed rule.

The Board should be congratulated for their forward thinking and determination.

Sincerely,

Scott F. Simpson

President/CEO

Utah Credit Union Association

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Scott Simpson  
President/CEO  
Utah Credit Union Association

cc: CUNA, CCUL