

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 8, 2016

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

Dear Gerald Poliquin,

I am writing in support of NCUA's proposed changes to the Chartering and Field of Membership (FOM) Manual. While an employee and member of a state-chartered credit union, I believe the revisions would improve FOM requirements for federally chartered credit unions, easing undue burdens on their ability to provide financial services to individuals and families that feel that a financial cooperative can help meet their needs and improve their

financial well-being.

I believe the changes regarding core area service requirements, use of combined statistical areas, and population limits as they apply to a well-defined local community provide the opportunity for less arbitrary and more practical service areas.

I agree with the exclusion of non-depository institutions and non-community credit unions from the concentration of facilities ratio, for these institutions are not an option for many individuals in proposed FOM service areas.

Given current, and ever evolving, technology, I agree with the premise that branch location is insufficient to demonstrate a credit union's ability to serve its members. Therefore, I support the proposed change which will consider member online access in determining whether "Service Facility" is present for purposes of demonstrating reasonable proximity to a group.

I support a streamlined determination of stand-alone feasibility of groups between 3,000 and 5,000. The rate of consolidation of smaller credit unions demonstrates the challenges that a newly formed credit union of that size might have.

I also support the inclusion of SEG contractors and office or industrial park

tenants in a multiple common bond to better serve members closely associated with a SEG or who work in a particular area.

I appreciate the opportunity to provide comment. I believe those that will benefit the most from these changes are families and individuals that will be gaining greater access to credit unions, and that will subsequently benefit by having the choice of participating in a financial cooperative.

Sincerely,

Eric Lanham
SVP-Marketing
Seven Seventeen CU Inc

cc: CUNA, CCUL