

From: [Craig Atkinson](#)
To: [Regulatory Comments](#)
Subject: Appendix B of Part 701 - Chartering and Fields of Membership
Date: Friday, February 05, 2016 8:10:07 AM

Dear Secretary of the Board Poliquin,

I am writing today to show my support for the proposed changes to the National Credit Union Associations (NCUA) Field of Membership (FOM) regulation. I lead a state chartered credit union with an asset size of 62 million and totaling 5,800 members. Although Houston Highway Credit Union is state chartered, and the proposed changes are for federal credit unions, we believe this still impacts our operations. Thank you for the time to post a comment on this matter.

A dual charter system for credit unions has shown to be effective, and this is something we do not want to change. This system creates incentive for NCUA and state regulators to move in the direction of policies that allow broader operating authority and impose fewer unnecessary constraints on operations. Within the recent decade, federal charters have fallen behind state charters with flexibility in reaching potential members. This is why innovation and reform is necessary for FOM flexibility.

I want to highlight support for the following proposed changes:

- Allowing community charters to serve a portion of a Core Based Statistical Area (CBSA) without serving the entire area and including these smaller portion as well-defined portions. Including congressional districts as well-defined local communities (WDLC).
- Redefining population limits among rural communities to be more realistic and allowing rural districts to expand across state boundaries for bordering states.
- Inclusion of office or industrial park tenants within a common bond.

Allowing federal credit unions a portion of a CBSA gives our credit unions an advantage to growing appropriately with its ability to serve a larger area. As credit unions are unique, we don't necessarily contain a core area. So this proposed change provides greater flexibility for service.

Changing these population limits quadruples the current cap of potential service from 250,000 to 1 million. For those whose districts extend past their state borders, this proposal would allow for an area to qualify as a rural district.

Including office or industrial parks with a mutual common bond will open up SEG possibilities for businesses apart of these conglomerates and add them as their own separate SEG.

Continuing to update these regulations to a more modern fit is welcome. No proposal is perfect, and I hope that we can continue to make progress in changing our FOM rules in the future. As a not-for-profit our identity is confined to those in which we service. Forcing restrictions on that ideal has always made it difficult for us to stand up against the big, for-profit institutions. With that said, we largely show appreciation to NCUA for being pro-active, and we urge the Board of Directors to vote in favor of this proposal. Thank you for the time to comment and considering the views that federal and state chartered credit unions share.

Sincerely,

Craig Atkinson
8120 Washington Ave
Houston, TX 77007