



United Nations Federal Credit Union

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Via Electronic Mail
regcomments@ncua.gov

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

Re: Comments on Notice of Proposed Rulemaking Regarding Field of Membership and Chartering

Dear Mr. Poliquin:

On behalf of the United Nations Federal Credit Union ("UNFCU"), I am pleased to respond to the National Credit Union Administration's ("NCUA's" or the "Agency's") request for comment regarding the proposed rulemaking on field of membership (FOM) and Chartering for federal credit unions (80 FR 76748 (10 December 2015)).

UNFCU greatly appreciates the level of commitment the Agency has shown in considering the important fundamental issue of enabling consumers to have access to credit union services should they so choose. UNFCU strongly supports the proposed changes. Set forth below are some areas UNFCU wishes to highlight:

In order to properly serve any group, ready access to credit union services is essential. It is understandable how the Agency would have historically interpreted the "reasonable proximity" requirement contained in the Federal Credit Union Act to mean a brick and mortar location. However, the advent of technology enabling members remote access to credit union services and the rapid expansion of that technology has made remote access ubiquitous. In fact, two-thirds of UNFCU's 115,000 members routinely use UNFCU's online products and services. UNFCU applauds the Agency for proposing this change



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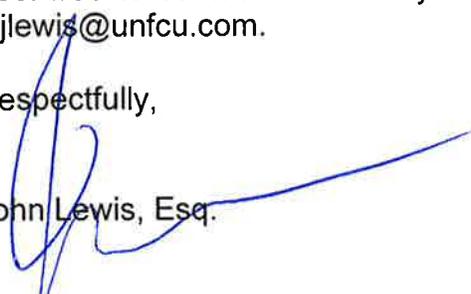
and urges it to make the change final in its rules.

UNFCU is very pleased that the Agency has proposed to allow multiple common bond credit unions to add employees of contractors with a “strong dependency” to the select employee group (SEG) sponsor. Many organizations have been steadily shifting core functions from in-house employees to contractors. These contractors and their employees are often inextricably tied to the sponsor. This is true for single common bond credit unions and multiple common bond credit unions alike. As such, there should be no distinction made between the two in serving the financial needs of contractors and their employees. As noted above, this will provide consumers greater access to credit union services should they so choose.

The administration of credit unions continues to become more and more complex and onerous. This seems to be true both for credit unions and NCUA. UNFCU supports proposed changes where efficiencies can be created without jeopardizing the integrity of the process or safety and soundness. The inclusion of employees of industrial/office park tenants as a select employee group is one such proposed change that UNFCU supports. In many instances, there are numerous individual tenants of industrial parks and office buildings whose employees would be eligible for credit union membership. Some of these tenants may only have a few employees. The process of adding each of these tenants can be time consuming for the credit union’s management and its board of directors as well as for NCUA. To be able to list the industrial/office park itself will create greater efficiencies and further foster the availability of credit union services to consumers.

Once again, thank you for your efforts and your consideration of our comments. Should you have any questions or require additional information, please feel free to contact me directly via telephone at +1 347 686 6630 or by email to jlewis@unfcu.com.

Respectfully,


John Lewis, Esq.

CC: William Predmore, President/CEO (UNFCU)