

February 05, 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,

Thank you for providing the opportunity to comment on the proposed Field of Membership revisions.

The National Credit Union Administration Board (NCUA) is proposing to amend part 701 of its rules and regulations to make revisions to the agency's chartering and field of membership manual. I am writing on behalf of approximately 110 Connecticut Credit Unions, the more than 850,000 current members represented by them, and the nearly 3 Million Nutmeggers whose financial needs could be best served by a not-for-profit financial cooperative. I support NCUA's proposed field of membership rule for the opportunity it creates for consumers to access more choice in financial services.

Connecticut is a small but diverse state, with extreme disparity in income levels throughout the state. It is a place where the "average" income does not tell the whole story and consumers in every part of the state can benefit from access to affordable financial services delivered through credit unions. Yet, many federally chartered credit unions have experienced restrictions that prevent them from being able to serve the entire swath of potential members that would benefit. In fact, we have seen several credit unions in the past 18 months convert to state charters in order to expand their fields of membership and better serve their communities. Expanded Field of Membership parameters will help credit unions remain committed to their current charter while still serving those most in need.

I would recommend that NCUA looks even more closely at its definition of a rural district. I understand that with the current definition, there are no qualifying areas in Connecticut; however, anecdotally, there are several areas in the state-- particularly in the northwest and northeast corners-- that would benefit from being defined as rural districts.

I particularly applaud the inclusion of office and industrial park tenants in a multiple common bond, as well as expanded access within TIP charters.

Thank you for reviewing the updated Field of Membership definitions and considering how the industry can become stronger while better serving consumers through increased access to affordable financial services. I appreciate the opportunity to comment on this proposed rule. We urge the agency to approve a final rule soon so that credit unions can take advantage of the regulatory relief and field of membership flexibility in the proposed rule.

Sincerely,

Jill Nowacki
President/CEO
The Credit Union League of Connecticut Inc

cc: CUNA, CCUL