

**From:** [Jarrod Reisner](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [Nancy Miles](#)  
**Subject:** Comments on Notice of Proposed Rule, Part 701 – Chartering and Field of Membership  
**Date:** Thursday, February 04, 2016 6:56:32 PM  
**Attachments:** [image002.png](#)

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Jarrod R. Reisner  
Black Hills Federal Credit Union  
P.O. Box 1420, Rapid City, SD 57709

Gerard Poliquin, Secretary of the Board  
1775 Duke Street, Alexandria, VA 22314-3428

**Subject:** Comments on Proposed Rule, Part 701 – Chartering and Field of Membership

Dear Secretary Poliquin:

I submit this comment letter as a member of the Executive Management Team at Black Hills Federal Credit Union (BHFCU) in Rapid City, South Dakota. The proposed Field of Membership (FOM) rule is very important to us at BHFCU.

I support the proposed population cap increase to 1,000,000. Despite our dedication to provide local financial services, like other rural credit unions, we have been severely restricted by the population cap of 250,000 placed on rural districts. In a state of roughly 855,000 people, current regulations have prevented us from serving communities in need of strong, local, cooperative-based financial institutions. All of those citizens deserve access to services credit unions can provide.

I also support the recognition of one congressional jurisdiction as a well-defined local community. We are represented by two senators and one representative federally, working for what is best for the community of South Dakota. Our legislators serve all 855,000 residents, we seek the ability to do the same. Being convenient, local and accessible to members and future members is a priority for BHFCU and credit unions in South Dakota.

South Dakota is a wide-spread community with limited, local financial institutions, especially in rural communities. Hundreds of small communities dot the landscape, many of which do not have access to member-owned, not-for-profit financials. Additionally, we have nine Indian reservations in South Dakota. These underserved and low income areas of our state need access to financial services that credit unions want to provide.

The National Credit Union Administration's proposed Field of Membership rule is an important step toward ensuring members have a choice in financial services. I urge you to support this proposal.

Sincerely,



Jarrod R. Reisner  
SVP Finance  
Black Hills Federal Credit Union

Thanks,

**Jarrod Reisner**



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