

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,

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 Nebraska Energy Federal Credit Union, which serves over 10,000 members in the electric power industry to express support for NCUA's proposed field of membership rule. I appreciate the opportunity to express my support and to provide additional recommendations.

In addition to the provisions put forth in the proposed rule, it is my opinion that the TIP charter should not be considered once and done. If there is a merger between a TIP charter credit union and another credit union, the field of membership should be a combination of what their two fields of membership were before the merger, e pluribus unum. Growth within both fields should be encouraged post-merger.

Diverse fields of membership help assure the long term viability of the surviving credit union, as the likelihood of a credit union not being able to survive some negative sponsor event such as a decline in some commodity price is diminished by having more than one group.

Many states have more progressive field of membership regulations than NCUA. Why not let federally chartered credit unions choose whether to follow federal or their own state charter field of membership rules without having to change to a state charter?

Thank you for the opportunity to comment on this proposed rule and for considering our views on Field of Membership. 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,

Stanley Fraser
Chief Executive Officer
Nebraska Energy FCU

cc: CUNA, CCUL