

From: [John E. McWeeney, Jr.](#)
To: [Regulatory Comments](#)
Subject: NCUA Proposed Changes to Field Of Membership Requirements
Date: Friday, February 05, 2016 1:05:07 PM
Attachments: [image00161aaae](#)
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Gerard S. Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Dear Mr. Poliquin,

On behalf of the 101 member banks of the New Jersey Bankers Association I'm writing to express our strong opposition to the NCUA's proposal to change the field of membership requirements for credit unions. The NCUA's proposal to redefine local community and rural districts, provide additional methods of membership expansion for multiple common bond credit unions and redefine member's proximity to multiple common bond credit unions is a clear attempt to circumvent Congressional intent. The NCUA is overstepping its regulatory reach and should instead attempt to achieve the proposed changes through the legislative process. These changes will be detrimental to community banks throughout New Jersey and the United States and unfairly disadvantage their ability to serve their communities. We urge you to reconsider these proposals and the process for seeking legitimate approval and will share our concerns with the members of the New Jersey Congressional delegation.

Sincerely,

John E. McWeeney, Jr.
President & CEO

John E. McWeeney, Jr.
President and CEO
New Jersey Bankers Association
411 North Avenue East
Cranford, NJ 07016
Phone: (908) 272-8500 x627
Fax: (908) 272-6626

jmcweeney@njbankers.com





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