

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 the opportunity to comment on the proposed amendments to the National Credit Union Administration's field of membership rule. I am writing on behalf of Pittsburgh Central FCU, which serves the Allegheny, Beaver, and Butler communities in western Pennsylvania. I would like to express my support for NCUA's proposed changes and modernization of the field of membership rule.

The proposed changes will have a positive impact on the credit union movement. Expanding the reach of credit unions is necessary in today's market so that people of limited means have the ability to join the banking system. Credit unions were founded on this tenet and increasing access can only be of benefit to consumers and the economy as a whole. Credit unions were not the cause of the financial crisis in 2008, but we can certainly be part of the solution. Modernizing and streamlining the field of membership rules will certainly assist in achieving this goal.

I support the changes addressing the use of Congressional districts as a well-defined community, and also allowing credit unions reasonable access to areas that are contiguous to those they already serve. However, NCUA must provide more information on the standards and process a community credit union must follow when trying to add areas using this provision.

I also commend the agency for streamlining the process by which federal credit unions can expand its field of membership. But, NCUA should consider eliminating population limits for the use of the CSA and CBSA, or at the very least, raise that limit to at least 10 million, which is approximately the population of the largest single political jurisdiction that NCUA has approved. Please also ensure that technology in our industry is properly addressed in the final rule. If you are going to modernize this rule, this factor must be woven into the various principles within the rule.

I ask that you also strongly consider the positive feedback from congressional members who support these changes to the FOM rules. Their opinions should count more than the negative views of the ABA lobbyists who only seek to curtail competition in our industry.

Again, thank you for the opportunity to comment on this proposed rule and for considering my views. I 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,

Patricia Morrissey
President/CEO
Pittsburgh Central FCU

cc: CUNA, CCUL