

From: [Teresa Miller](#)
To: [Regulatory Comments](#)
Subject: Comments on Proposed Rule Chartering and Fields of Membershi
Date: Friday, February 05, 2016 11:00:19 AM

Dear Secretary of the Board Poliquin,

The National Credit Union Association's proposed rule reforming the Field of Membership regulations is much appreciated. These rules have not been updated in some time and are no longer adequately serving the credit union industry. In fact, they are limiting member service and our ability to serve our communities and select employee groups.

Peninsula Community Federal Credit Union (PCFCU) has a community field of membership on the Olympic Peninsula in Washington State. However, the more rural Mason County is adjacent to Olympia, Washington, where there is a large auto mall with multiple car dealerships. There is only one car dealership in all of Mason County. Washington State has a very liberal state credit union charter allowing credit unions to open their FOMs to all school districts within the State. Our ability to compete for auto loans is restricted as the dealerships in Thurston County are not going to offer PCFCU auto loans when they have to figure out whether an individual is eligible for membership or not. Consequently, the largest portion of the PCFCU membership, residing in Mason County is typically steered away from their credit union.

Using a concept similar to Combined Statistical Areas (CSA) can be used as a well-combined local community (WDLC). Alternatively, if the CSA approach does not work, then perhaps this can be considered an area adjacent to a WDLC. The latter option may be a good solution as long as there are not policy or process hurdles making this provision inflexible.

Another approach to resolving our FCU FOM competitive restriction could be a use of the Congressional District being used as a WDLC. Washington State's 10th Congressional District includes our main office in Shelton, Mason County Washington. Thurston County, which includes the auto mall previously referenced, is also in the 10th Congressional District. The Congressional District is less than the 2.5 million population currently allowed for a CBSA.

We also believe the rural district population limit is too low and unduly limits credit union access. The only limitation should be the credit union's ability to serve the rural district. And, with the realities of internet banking, a credit union with an acceptable level of online banking services should be authorized to provide membership to people living in rural areas of the country.

Every American should have easy access to a credit union for financial services. I support any new regulation that does not place our credit union at a competitive disadvantage.

Please pass the proposed rule as soon as possible so that more people can join credit unions.

Sincerely,

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