

**From:** [Deborah Lamb](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Deborah Lamb Comments on Notice of Proposed Rulemaking Regarding Associational Common Bond  
**Date:** Friday, February 05, 2016 6:43:27 PM

---

Gerard Poliquin  
National Credit Union Administration  
Alexandria DC 22314

Deborah Lamb Comments on Notice of Proposed Rulemaking Regarding Associational  
Common Bond

Dear Gerard Poliquin:

Keep the playing field for lenders fair and equitable. Tax lending institutions in an impartial manner.

Dear Mr. Poliquin:

As a banker, I am concerned about the impact of further expanding the credit union industry's potential field of membership through the proposed rule on Chartering and Field of Membership. The provisions of this proposal, when implemented all together, would provide federal credit unions with the opportunity to increase membership drastically, resulting in a broad expansion of the credit union industry's tax subsidy.

- My bank serves customers and the surrounding community, and unfair competition from the credit union industry impacts my business. Banks are not tax exempt, but are for-profit businesses attempting to balance offering products and services to best serve customers while growing the business to offer more lines of credit and other economic capital to communities.
- Congress has kept in place advantages for the credit union industry, but those advantages come with limitations, including the size of the institutions and scope of activities. Congress understood that if community credit unions were to fulfill their public mission, there needed to be a legitimate shared bond among members, even amending the FCU Act in 1998, to include the term "local." Combined with the terms "well-defined," it is clear Congress intended to impose finite and narrow limits on the area that a community credit union may serve. This proposal goes beyond any reasonable definition of local and well-defined. In addition, the proposal expands the rural district population limit by four times the current threshold to one million.
- Congress deliberately instructed NCUA through the FCU Act to keep credit unions small and focused on providing services to specific groups that lack other access to financial services.

Keep the playing field for lenders fair and equitable. Tax lending institutions in an impartial manner.

Sincerely,

Deborah Lamb  
75 North University Ave  
Provo, UT 84601