

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,

February 2016

To Whom It May Concern:

The National Credit Union Administration Board (NCUA) is proposing to amend Part 701 of its rules and regulations to make revisions to both the Chartering and Field of Membership Manual. On behalf of the Anheuser-Busch Employees' Credit Union and Division, I am writing to express our support for NCUA's proposed field of membership rule.

We applaud NCUA's proactive approach in addressing the field of membership issue and for providing solutions. Our Credit Union has been in existence for over 75 years and we understand the importance of preserving the industry and providing access for future generations.

NCUA's proposal is comprehensive therefore our Credit Union would like to comment on some of the components of the recommendation we support:

- Use of Combined Statistical Area (CSA) – *CSAs are comprised of statistical areas with close community ties and naturally represent a Well-Defined Local Community (WDLC).*

- Addition of an Area Adjacent to a CBSA – *This provision affords credit unions an opportunity to expand into communities that do not fall within a WDLC.*
  
- Reasonable Proximity through Members’ Online Access to Services - *By expanding the definition of “Service Facility”, credit unions are able to serve more members using emerging technologies.*
  
- Inclusion of Select Employee Group Contractors in a Multiple Common Inclusion of Office or Industrial Park Tenants in Multiple Common Bond. - *This provision allows greater flexibility to serve members closely associated or who work in a particular area.*
  
- Other Persons Eligible for Credit Union Membership – *This is a timely provision as it facilitates veterans’ ability to join a credit union, an important segment of our population.*

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,

Pier Alsup  
SVP-Marketing/Business Development  
Anheuser-Busch Employees CU

cc: CUNA, CCUL