

February 08, 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,

Mr. Gerard Poliquin
Secretary of Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

February 8, 2016

Dear Director Poliquin,

On behalf of XCEL Federal Credit Union, I am writing to you regarding the National Credit Union Administration's (NCUA) proposed rule amending the Chartering and Field of Membership (FOM) Manual, incorporated as Appendix B to part 701. I appreciate NCUA's initiative in this rulemaking to provide meaningful regulatory relief to credit unions and welcome the opportunity to provide comments on this proposal. The credit union industry has long advocated for FOM reform, and we appreciate the NCUA Board's support for modernizing the agency's FOM regulations for the first time in fifteen years. My comments will be targeted specifically to the proposed changes affecting multiple common bond charters. Currently, I serve as the VP/CFO of XCEL Federal Credit Union, charter # 16218, in Bloomfield, New Jersey.

These changes, if adopted, would allow XCEL to continue on the path of measured growth that we've been on for the last several years. Allowing honorably discharged soldiers to join a multiple common bond credit union is a very patriotic thing to do. The only way this could be better is to allow any honorably discharged veteran to join ANY state or federal credit union-it is literally, the least we could do for them.

Permitting the addition of persons who work regularly for an entity that is under contract to the sponsor of the Select Employee Group (SEG) listed in a multiple common bond charter, provided there is a "strong dependency relationship" with that sponsor is pretty logical. For example, one of our SEG's Bloomfield College, outsources its maintenance to a private contractor. These individuals literally spend their entire career onsite at Bloomfield College, but aren't employees, so they get charged foreign ATM fees and cannot take advantage of our great rates and services. So this make great common sense too.

But the most important pending rule change is easily the "reasonable proximately through online access" provision. Since the last change to the Chartering and FOM Manual some fifteen years ago, a lot has changed, the world has changed. We offer our members every convenient mobile service there is including remote check deposit and mobile bill pay. Our members demand and deserve our best. Allowing them access through the internet is common sense and for the NCUA to consider online access as reasonable proximity is just fantastic. This single provision allows us to expand our membership beyond the physical boundaries that currently tie us in. This is not a floodgate that we are opening where new members would come stampeding in. It's a way that allows our remote members to recommend us to their coworkers and neighbors. It takes some of the mystery and a lot of the pain out membership. It's a GREAT provision that I fully support.

Thank you very much for the opportunity to comment on this proposed regulation. I applaud the agency's willingness to amend the Chartering and FOM Manual to provide much-needed relief for the credit union industry. While I strongly support this proposal, I encourage the agency to consider the recommendations outlined above, as I believe these suggestions will meet the needs for credit unions. If I can be a source of any further information on this comment letter, please do not hesitate to contact me at

ArleneBernard@XCELfcu.org or by phone at (201) 499.1655.

Yours truly,

Arlene Bernard

Sincerely,

Arlene Bernard
VP/CFO
XCEL FCU

cc: CUNA, CCUL