

**From:** [Robert Blumberg](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [John Trull \(NWCUA\) \(JTrull@nwcua.org\)](mailto:JTrull@nwcua.org)  
**Subject:** Comments on Notice of Proposed Rulemaking Regarding Associational Common Bond  
**Date:** Monday, February 08, 2016 4:38:16 PM

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Dear Sir/Ms.,

I support the National Credit Union Administration's proposed field of membership rule.

The credit union I work for, Wauna Federal Credit Union, is located in a rural setting in the northwest corner of Oregon. We cover three counties, two counties in Oregon and one county in Washington, namely Columbia and Clatsop in Oregon and Pacific County in the State of Washington. All three of those counties have high unemployment rates and low to moderate income. We struggle to grow the credit union to reach the size economies to provide the resources to pay for the services and products that our members expect by covering our existing footprint.

Recently, a sister credit union, TLC Credit Union, that overlapped our territory in Clatsop County was placed into receivership and all the assets were transferred to Fibre Federal Credit Union thus allowing Fibre Federal Credit Union to circumvent the current field of membership rule. This was good for the TLC Credit Union's members but Wauna Federal Credit Union is now having to compete with a much larger credit union in our market place with vast amount of resources. This severely limits our expansion into any other new markets down the Oregon coast that are now been served by Fibre Federal Credit Union. The only expansion Wauna Federal Credit Union can now make is towards Washington County, Oregon and expanding into Washington County will be limited based on the existing field of membership rule. If this rule is increased to one million, then Wauna Federal Credit Union will be able to expand into Washington County and continue to grow and provide the necessary services for all our members. This will be a win for the community of Washington County which is currently under represented by federal credit unions and a win for the members of Wauna Federal Credit Union.

Please implement this field of membership rule as soon as possible so Wauna Federal Credit Union can expand into Washington County.

**Robert Blumberg**

*Wauna Credit Union CEO and President*

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