

From: [Chuck Papenfus](#)
To: [Regulatory Comments](#)
Subject: 12 CFR Part 701, Chartering and Field of Membership Manual
Date: Friday, February 05, 2016 8:10:25 PM

February 5, 2016

National Credit Union Administration
Gerald Poliquin, Secretary of the Board
1775 Duke Street
Alexandria, VA 22314-3428

Re: Comments on Proposed Field of Membership Rule

As the CEO of Inland Valley Federal Credit Union (IVFCU), I welcome and appreciate the opportunity to comment on the proposed Field of Membership Rule. IVFCU serves the underserved area including the cities of Fontana, Rialto, Colton, Bloomington and Muscoy. We have 3,387 Members and \$42.2 million in assets.

As a low income credit union we experience first-hand the value that a credit union can provide to a community. Thus we support the efforts in this proposed rule to remove barriers that prevent consumers from joining a particular credit union. We appreciate the updated definitions of common bonds and communities. Additionally, we support the revised service facility definition for Select Employer Group expansion to include computer based and mobile channels. However, we are concerned that this definition was not applied to underserved areas. We feel this creates an inequitable situation to low-income persons in underserved areas who could have access to services via a mobile device.

In conclusion, we thank the administration for the efforts to modernize the Chartering and Field of Membership manual.

Sincerely,

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