

Gerard S. Poliquin  
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Submitted electronically on Federal eRulemaking Portal  
Re: RIN 3133-AE31

February 5, 2016

Dear Mr. Poliquin:

On behalf of the credit unions in the state of Iowa, I appreciate the opportunity to comment on the National Credit Union Administration's (NCUA) proposed changes to the Charter and Field of Membership Manual. The Iowa Credit Union League (ICUL) represents the interests of nearly 100 credit unions and over one million credit union members. ICUL is in favor of NCUA rulemakings which aim to provide safe and sound regulatory flexibility that helps ensure credit unions are able to serve their members. The adjustments to the Manual, especially those based on changes to support rural areas and changes in technology are appreciated. ICUL strongly supports this proposal and encourages NCUA to continue to evaluate ways to modernize regulatory requirements.

The increased flexibility provided in this proposal is indicative of the type of regulatory change that will benefit the safety and soundness of the industry. The proposal maintains the common bond requirements while allowing true common bond groups to be included in a federally chartered credit union's field of membership. ICUL supports this proposal and other regulatory flexibility efforts that promote reaching rural communities. Allowing additional flexibility, through increasing the population limitations of rural communities and expanding what is included in a Well-Defined Local Community will help credit unions reach other common bond groups.

ICUL also supports the change to the "reasonable proximity" standard and amended definition of a service facility that would include access to a financial institution through a transactional website or certain mobile platforms. Technology has changed significantly since NCUA last updated the field of membership requirements. ICUL encourages NCUA to continue to review its Manual and other regulations in terms of how technology has changed the consumer's use of financial services.

ICUL appreciates the changes included in the Manual and encourages NCUA to continue to modernize the regulatory environment based on developmental changes in Iowa and across the country. Allowing more flexibility in the field of membership process as well as other areas of regulation will benefit the credit union industry and the consumers they serve.

Sincerely,



Murray Williams  
Acting CEO  
Iowa Credit Union League

