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February 8, 2016

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

RE: Proposed Amendment to the Field of Membership Rule

Dear Mr. Poliquin

This comment letter represents the views of TrueCore Federal Credit Union (TFCU) on the proposed amendment to the Field of Membership (FOM) rule. The officials of TFCU appreciate the agency's time and willingness to address the challenges, economic disadvantages, and regulatory burden the current rule places on federally chartered credit unions. By way of background, TFCU is a \$150 million federal credit union located in Newark, Ohio. We serve one Ohio county and have approximately 16,000 members.

2013 Community Charter Request

In 2013, TFCU serviced over 250 select employer groups primarily located throughout Licking County. During a strategic planning session, the officials of the credit union approved to request a community charter to reduce current concentrations, have an opportunity for growth potential, and attempt to serve additional underserved areas. The officials felt the SEG-based charter, although valuable, was limiting the potential growth of TFCU. This request would help to diversify the membership base and would greatly benefit the credit union.

During 2013, TFCU submitted a community charter request to NCUA. The request was based on the Columbus, Ohio CBSA and requested the following counties:

- Franklin County
- Licking County
- Delaware County
- Fairfield County

Due to the requirements of the rule, the officials of the credit union were required to request Franklin County. Franklin County (City of Columbus) is considered the core of the CBSA. As a \$150 million credit union with marginal earnings at the time, this requirement was extremely burdensome. The officials of TFCU had no strategic intentions on expanding into Franklin County. The City of Columbus and Franklin County was and continues to be saturated with various banking alternatives.

During the review process, TFCU was contacted by NCUA's OCP stating that TFCU would be required to put two branches in the core of the CBSA. As stated above, this was not within the officials' strategic focus nor was this a financially viable option. TFCU ended 2013 with a marginal \$7,023 in net income.

Despite the credit union's low net income, the OCP was requesting an additional two branches within two years. TFCU felt this request was not only excessive, but would put such a financial strain on TFCU that it would not be beneficial to the membership or the credit union.

Due to a request that was outside the officials' strategic focus and not in the interest of its membership, TFCU amended the charter request to only serve Licking County. TFCU hopes NCUA sees the burden it would have placed on TFCU. The proposed change to not require serving the core of the CBSA is extremely important and should remain as proposed. This allows credit unions to request and serve various parts of the CBSA and focus on what is best for its membership versus working to meet rule requirements and regulatory burdens.

We thank NCUA for the opportunity to comment on this proposed regulation

Sincerely,

A handwritten signature in black ink that reads "Trisha Clark". The signature is written in a cursive, flowing style.

Trisha Clark
Director of Risk Management
TrueCore Federal Credit Union