



February 5, 2016

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

RE: Comments Proposed Rulemaking for Field of Membership, 12 CFR Part 701

Dear Mr. Poliquin,

I would like to commend the NCUA Board and Staff for undertaking such a monumental project to modernize the field of membership rule.

Rural Districts, and Population Caps

Meridian Trust Federal Credit Union is headquartered in a rural state with not one town or city exceeding a population of 90,000 people. Properly defining rural districts and instituting realistic population limits are long overdue in a world where there should be no redlining of membership access to a credit union.

The proposed regulation could go further and eliminate population caps altogether in defining jurisdictions. A jurisdiction is a clearly defined area. Using an arbitrary cap seems to add unnecessary conditions. View it in symbolic terms as the waiter says, "You can have the beef stroganoff as long as there is *only* two of you at the same table. Otherwise, you have to settle for what you already have on your table."

Congressional Districts

A congressional district is within the reasonable definition of a well-defined, local community. We support this change in the provision.

Reasonable Proximity through Members' Online Access to Service

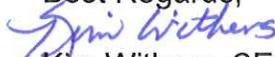
Using any sort of mileage or distance to the nearest branch in this technological world is prehistoric. We can see how useful it was back in the day when cavemen were dragging knuckles to the nearest branch, but today, it is obsolete.

Sensibly and Appropriate

This reform is essential for the financial strength of many Americans that have been unjustifiably denied membership. It is time to change the regulation from serving institutions to serving real people, real Americans.

Thank you for the opportunity to comment on the proposed regulations. The NCUA Board demonstrates legal and necessary authority to revise the regulation as Congress intended. This is the real world environment and Americans need real solutions.

Best Regards,


Kim Withers, CEO