

January 22, 2016

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

RE: Comments on Notice of Proposed Rulemaking for Field of Membership - RIN: 3133-AE31

Dear Gerald Poliquin,

Introductory paragraph:

The National Credit Union Administration Board (NCUA) is proposing to amend part 701 of its rules and regulations to make revisions to the agency's chartering and field of membership manual. I am writing on behalf of [your credit union name], which serves [your field of membership] to express support for NCUA's proposed field of membership rule.

Letter Body:

Why does your credit union / league support NCUA's proposed FOM changes?

How will the changes in this proposed rule impact your credit union?

Describe how this proposed regulation will make the use of a Core Based Statistical Area (CBSA) more flexible. What else can NCUA do to enhance the use of CBSA?

How will the increase in population limit for rural districts from 250,000 to 1 million help your credit union serve members?

Should NCUA increase the population limits for the use of the CSA and CBSA to more than 2.5 million? CUNA has advocated for 10 million, which is approximately the population of the largest single political jurisdiction that NCUA has approved.

Do you support the use of Congressional districts as well-defined local community?

Under the current regulation, when a credit union seeks to serve an underserved area, NCUA calculates a proposed area's concentration of facilities ratio to meet a statutory requirement that a proposed area be underserved by other depository institutions. What other alternative methods can NCUA use to identify underserved areas?

Do you support the inclusion of office and industrial park tenants in a multiple common bond?

Do you support NCUA proposed streamlined determination of stand-alone feasibility for groups between 3,000 and 5,000 members?

Summary of your position:

[Write the summary of your position here.]

Closing paragraph:

Thank you for the opportunity to comment on this proposed rule and for considering our views on Field of Membership. We urge the agency to approve a final rule soon so that credit unions can take advantage of the regulatory relief and field of membership flexibility in the proposed rule.

Sincerely,

Matthew Jennings  
Chief Executive Officer  
Quest FCU

cc: CUNA, CCUL