

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,

I am writing on behalf of Railroad & Industrial Federal Credit Union, which serves Multiple Common Bond Select Employee Groups to express support for NCUA's proposed field of membership rule.

We support the proposed FOM changes for many reasons, but the major reason is to make sure credit unions remain a viable financial choice for all Americans.

As a Multiple Common Bond credit union, we know firsthand that many companies have come to view the industry as a commodity. The employees of our company groups feel that they can join any credit union anytime because of the increase of community charter credit unions and multi-state credit unions. The feeling of an employee benefit is not what it used to be. It is harder and harder for a SEG based credit union that is not \$1 billion in assets to remain relevant.

We definitely support the inclusion of office and industrial park tenants in a multiple common bond and believe that only the leasing office or agent should need to agree to the inclusion of the credit union to its tenants. A letter with all the tenants listed would be difficult for the credit union to keep up to date when there are so many changes in tenants at parks and plazas.

I full believe the increase of that number of employees from 3,000 is needed. The limit should increase to 7,500 or maybe even 10,000. The reason, it is far more difficult to get the extensive paperwork and financial statements.

We agree with all the proposed changes and also would like to see further simplification of field of membership expansion request.

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,

Pamela Griffiths  
VP-Marketing  
Railroad and Industrial FCU

cc: CUNA, CCUL