

From: [Bruce Bryan](#)
To: [Regulatory Comments](#)
Subject: Bruce Bryan Comments on Notice of Proposed Rulemaking Regarding Associational Common Bond
Date: Friday, January 15, 2016 1:16:55 PM

Dear Secretary Poliquin,

I am writing in support of the NCUA's proposed Field of Membership rules for Federal credit unions.

WyHy FCU is headquartered in Cheyenne, WY. With assets slightly over \$200,000,000 we have physical branches in Cheyenne and Casper. As of 2014 the population of the entire state of Wyoming was 584,000, smaller than many major cities in the country. We have 29 credit unions in the state, all Federally chartered. Average assets of our credit unions is less than \$88 million. The citizens of this state however, share a tight bond of independence and self-reliance. We love Wyoming and resist the need to rely on other states – and their financial institutions – to meet our needs.

I would note some of the specific provisions of the proposed rule that would greatly benefit the ability for local credit unions to serve our state in providing financial services to a great many low populated areas, while providing needed income and strength to the credit unions of Wyoming:

Core Area Service Requirement – This section grants a community chartered credit union to serve a community consisting of a portion of a Core Based Statistical Area (CBSA). We note that CBSA or a “core” is not contained as a definition in the FCUA, but is an agency NCUA establishes standards based on its authority under the rule to define such areas.

Reasonable Proximity through Members' Online Access to Services – This timely update permits technology to be utilized in determining whether a “Service Facility” is present for demonstrating reasonable proximity to a group. A credit union, such as ours, is able to provide all services to our members through remote and mobile channels. This efficiency reduces costs while allowing the member to utilize the full benefit of credit union membership.

Congressional District - Would allow a Congressional district to be used as a well-defined local community (WDLC). A congressional district often has like interests and needs that create a bond for these citizens. This local bond could be well served by credit unions with this WDLC designation.

Rural District Population Limits - This increase to the current 250,000 limit of the population that a rural district charters can serve to 1 million. Although our state is not that heavily populated, it would allow the potential ability to reach out to geographically remote people. Providing much needed financial competition to these areas.

We applaud the Board's efforts in proposing changes that will allow credit unions the ability to serve their members and allow people the ability to avoid the costly alternatives that often flood the market. The Board's courage to move forward with these changes will definitely benefit the citizens of this state and the entire country.

Thank you for your time.

We're with you,

Bruce Bryan



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