



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

January 21, 2016

Dear Mr. Poliquin,

As the President/CEO of Meridia Community FCU, I am writing to express my strong support for NCUA's proposed amendments to its Chartering and Field of Membership (FOM) Manual. These changes would have a direct and positive impact on my credit union's ability to provide financial services to the residents of Western New York.

I have had firsthand experience with the hurdles that NCUA's existing requirements place in the way of credit unions seeking to serve additional consumers. My credit union once tried to add a county adjacent to its service area. Even though the area into which we were seeking to expand was within close proximity of our existing footprint, because it was located in a separate county it didn't fit within the geographic boundaries that NCUA now uses to determine if a community is "well-defined." In addition, we had no right to explain to NCUA why it should be considered part of our existing community. In contrast, our credit union was allowed to expand into a similar area that was located within the same Combined Statistical Area as our existing community. NCUA's present use of geographic limitations that were not designed for banking purposes is simplistic and unreasonable. Against this backdrop, I strongly support NCUA's proposal to reintroduce narratives for the purpose of allowing credit unions to explain why an area outside of, but adjacent to, a CSA, should be treated as one community.

I also agree that NCUA should eliminate the "core of the core" requirement for credit unions located within Core Base Statistical Areas. This requirement makes it less likely that people who live outside core areas will have access to financial services as opposed to increasing services to "core" areas.

Finally, as technology enables credit unions to provide services without the use of physical facilities, NCUA must allow credit unions to demonstrate their ability to serve communities with technology that facilitates online banking. Increasingly, there are members who don't even go into a branch, but under the existing regulations, credit unions must still demonstrate how these members have access to brick- and-mortar branches.

Adoption of this regulation will help my credit union grow. I urge the NCUA to quickly finalize the regulation and to continue to look for ways to aid credit unions consistent with statutory requirements.

Sincerely,

Michael Hoffman
President/CEO
Meridia Community FCU