

**From:** [Todd Marksberry](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [Ben Greiving](#); [Steve Ferrero](#)  
**Subject:** Comments on Notice of Proposed Rulemaking for Field of Membership - RIN: 3133-AE31 + Public Service Credit Union (Colorado)  
**Date:** Tuesday, January 19, 2016 3:41:43 PM  
**Attachments:** [723E364A-6B80-4F15-8162-F94883784E17\[1\].png](#)  
**Importance:** High

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National Credit Union Administration

Gerald Poliquin, Secretary of the Board

1775 Duke Street  
Alexandria, VA 22314-3428

Dear Gerald Poliquin,

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 Public Service Credit Union (PSCU), a state-chartered credit union in Colorado which serves more than 170,000 members in communities across the state, to express support for NCUA's proposed field of membership rule. As a state-chartered credit union, PSCU would not be directly affected by the proposed field of membership changes. However, PSCU has long been committed to the credit union industry, and partners with many other credit unions that are federally chartered and that will be affected by the rule. These collaborative efforts enable PSCU and other credit unions to offer financial services to large segments of the population that are underserved by traditional banks.

The proposed rule provides much needed regulatory flexibility that will help federally chartered credit unions to serve their communities more effectively in the 21st century. When more credit unions are able to serve their communities more effectively, the entire industry and (more importantly) American consumers will reap the benefits.

For all of these reasons, PSCU strongly supports the changes in the proposed rules, including making the use of a Core Based Statistical Area (CBSA) more flexible, allowing the use of a congressional district as a well-defined local community (WDLC), increasing the population limit for rural districts, broadening the flexibility in defining common bonds, and streamlining the application process for new credit unions formed by a small group of people. Furthermore, PSCU would urge the NCUA to consider increasing the population limits for the use of a CBSA to 10 million, which will position credit unions to continue serving their communities and providing tangible benefits to consumers in the future.

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

Sincerely,  
Todd Marksberry  
President & CEO

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