

February 08, 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 you to express My Credit Union's support of NCUA's proposed amendments to the Chartering and Field of Membership Manual. These proposed revisions to the Chartering and Field of Membership Manual, if finalized, would substantially improve NCUA's Field of Membership (FOM) requirements for federal credit unions.

MYCU is a state chartered credit union with \$32 million in assets and serves residents in San Mateo County in California. The revisions in the proposed rule will help community credit unions reach new members by eliminating some unnecessary requirements for community credit unions that base their FOMs on statistical areas. Furthermore, I support the addition of Congressional districts as well-defined local communities in the proposed regulation. These improvements will make it easier for community credit unions to serve members and to expand into communities that need financial services.

I also support the amendments that will enhance the other federal charters as I know, being a former federal credit union, that other federal credit union charters have struggled under NCUA's strict FOM regulations.

As a small credit union, I feel that it is important NCUA make its FOM regulation as flexible as possible. The flexibility in the proposed rule will help credit unions of all charters and sizes, including state charters, by strengthening the federal charter and ensuring that all credit unions have the flexibility to serve American consumers.

I support this rule and urge the NCUA Board to adopt a final rule as soon as possible.

Sincerely,

Alex Casillas
President
My CU

cc: CUNA, CCUL