

February 2, 2016

Sent electronically to: [regcomments@ncua.gov](mailto:regcomments@ncua.gov)

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

RE: Comments on Proposed Rulemaking Regarding Associational Common Bond,  
Field of Membership – RIN 3133-AE31

Dear Mr. Poliquin:

My name is Angie Owens and I am the President and CEO of American Airlines Federal Credit Union (American Airlines Credit Union or Credit Union). American Airlines Credit Union is a federally chartered credit union headquartered in Fort Worth, Texas. We have approximately \$6 billion in assets and serve more than 255,000 members located throughout the United States.

I appreciate the National Credit Union Administration (NCUA) reviewing and proposing the amendments to the Chartering and Field of Membership (FOM) Manual incorporated as Appendix B to Part 701 and especially commend the NCUA for providing regulatory relief to credit unions.

Our Credit Union was founded almost 80 years ago as a single sponsor credit union serving the employees of American Airlines, Inc. Specifically, a handful of employees' founded American Airlines Credit Union on May 19, 1936 at Midway Airport in Chicago, Illinois. Being a single sponsor credit union served our Credit Union very well for over 65 years until the tragedy of September 11, 2001. After 9/11, due to lack of passenger demand, canceled flights, new security costs and other factors, airlines in general filed for bankruptcy, laid off thousands of employees and cut other costs in order to survive. There was no growth in the airline industry.

In order to survive as a credit union and to continue our growth, we subsequently started working with the NCUA to amend our charter to become a Trade, Industry and Profession (TIP) single occupational common bond credit union. While we are very grateful that

we were able to work with the NCUA, the process while successful in the end was very challenging, expensive, time-consuming and at times a frustrating experience.

Subsequently after we had more experience with the TIP charter, we again worked successfully with the NCUA to make changes to the TIP charter. Somehow, in the previous TIP definition certain employees and companies who are integral to the Air Transportation Industry were not included in the definition of our Air Transportation TIP charter.

We whole-heartedly agree with the NCUA's Proposal to streamline and reform the FOM process. We are in favor of the proposal's expanded definition of a TIP to include employees of types of entities that have a strong dependency relationship on, and whose employees work directly with employees of, other entities within the same industry. For the Air Transportation TIP in particular, there is a lot of dependency between companies and airlines or airports in getting a passenger from point A to point B. We thank the NCUA for recognizing this strong dependency relationship.

Additionally, we would recommend that volunteers also be included in the TIP definition. Because of budget cuts and other reasons, some airports and airlines rely on airport volunteers instead of employees to assist with various passenger issues. These airport volunteers greet passengers; give them directions within the airport; provide information about location of gates, restaurants, restrooms, flight information, are usually in charge of a "lost and found" area and assist airline passengers in any way possible. An expanded definition to include these airport volunteers would benefit these volunteers who are usually retired and/or elderly.

Finally, we would recommend that the NCUA finalize the proposed rule as quickly as possible to provide regulatory relief to credit unions, streamline NCUA's process and remove non-statutory constraints. By providing much-needed relief for the credit union industry, we can quickly get back to serving more consumers and educate them on the credit union difference.

Thank you for taking the time to review our comments. If you have any questions, please contact me.

Sincerely,



Angie Owens  
President & CEO  
American Airlines Federal Credit Union

cc: Cornerstone Credit Union League  
CUNA  
NAFCU