

February 8, 2016

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

Re: Comments on Notice of Proposed Rulemaking Regarding Associational Common Bond – RIN 3133–AE31

Dear Mr. Poliquin:

The members of Thinkwise Federal Credit Union appreciate the opportunity to submit comments regarding the National Credit Union Administration Board's proposed changes to its chartering and field of membership (FOM) rules. Thinkwise FCU serves employees in the educational industry in the counties of Orange, Riverside and San Bernardino, California.

Thinkwise FCU fully supports the proposed chartering and field of membership rules changes. We commend the NCUA Board's efforts to comprehensively amend its chartering and field of membership rules to put them in a more efficient framework and to maximize access to federal credit union services to the extent permitted by law. We strongly believe this proposed rule is a progressive step towards rectifying some of the deficiencies in the federal charter which has fallen behind many state charters, including that of California. This proposed rule provides much needed flexibility for the operation of inclusive cooperative financial institutions for the benefit of consumers.

Trade, Industry or Profession (TIP) as a Single Common Bond

Thinkwise FCU supports all of the proposed changes to the chartering and field of membership rules with particular interest in the expansion of the definition of a TIP charter to include those vendors, contractors, or other groups closely associated with a particular trade or industry. With the variety of entities that have a strong dependency on the educational industry, such as school bus services, in-school lunch services, or school supply retailers, the proposed rules changes have the potential to grant access to affordable financial services to underserved consumers. The proposed rules changes will make Thinkwise FCU more apt to retain its TIP charter in light of the new gains in operational efficiencies by way of the proposed rules changes.

Thinkwise FCU fully supports the NCUA's proposed FOM rule in its entirety.

Sincerely,



Arnoldo Ramirez  
Compliance Manager