

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,

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 Members Trust of the Southwest FCU which serves multiple common bonds and several underserved areas, to express support for NCUA's proposed field of membership rule. I would like to thank you for your efforts to revise the Field of Membership and Chartering rules of the agency.

As the world has changed, we as credit unions must change as well. It is a well-known fact that at least here in the State of Texas, if you would like to have a more favorable access to a Field of Membership expansion, you would consider converting to a state charter. It appears that NCUA is attempting to bring some parity to this situation. Once again, I commend you for that.

I would encourage NCUA to consider each of the points that CUNA has made on increased access to FOM. I would encourage you to review the restrictions that have been imposed by NCUA Rules and Regulations related to FOM that are not restricted directly by the Federal Credit Union Act. These would include increasing the definition of rural districts from 250,000 to a larger number would make sense so that credit unions can continue to serve underserved areas.

The use of Congressional Districts for well-defined local community would make sense as well as the streamlined determination of groups that are greater than 3,000 individuals.

Again, I would support making Core Based Statistical Area more flexible , increasing limits for rural districts, utilizing Congressional districts as a WDLC and more streamlined access for

groups greater than 3,000.

Thanks for your consideration and for the opportunity to comment on this proposed rule and for considering our views on Field of Membership. I urge the agency to approve a final rule soon so that credit unions can take advantage of the regulatory relief and field of membership flexibility.

Sincerely,

Brian Gilbert
President/CEO
Members Trust of the Southwest FCU

cc: CUNA, CCUL