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February 2, 2016

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428
regcomments@ncua.gov

Re: Comments on Proposed Rule: 12 CFR Part 701, Chartering and Field of Membership Manual

Dear Mr. Poliquin:

Thank for your consideration regarding our formal comments from (CU Name) on the National Credit Union Administration's ("NCUA") recent proposed rule, 12 CFR Part 701, Chartering and Field of Membership Manual. We appreciate the opportunity to express our support and provide recommendations.

Our credit union represents 6,250 members. We commend and are supportive of the NCUA's proposed rules but would like to focus in on several areas of particular concern.

1. Core Area Service Requirement - Would allow a community chartered credit union to serve a community consisting of a portion of a Core Based Statistical Area (CBSA). We note that CBSA or a "core" is not contained as a definition in the Federal Credit Union Act.

Recommendation: NCUA should not place limitations on service areas in a statistical area, because these limitations or requirements can divide these areas into portions that do not represent a viable community or can exclude the viable portions of a community.

2. Population Limit as Applied to a Well-Defined Portion of a CBSA – The current FOM regulation does not allow a community chartered credit union to serve a portion of a CBSA if the overall population of the CBSA exceeds 2.5 million.

Recommendation: It clearly renders all CBSAs with populations that exceed 2.5 million useless for the purpose of being used as a WDLC for a community chartered credit union. A credit union seeking to serve its members should not be hampered or restricted in doing so by an entirely arbitrary bar such as 2.5 million.

3. Use of Combined Statistical Area – Would include Combined Statistical Areas in the definition of a WDLC. NCUA's current regulation does not allow a credit union to use a Combined Statistical Area (CSA) for a WDLC, regardless of population.



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demonstrating reasonable proximity to a group.

Recommendation: We support the expansion of the definition of “Service Facility” to demonstrate reasonable proximity to a group.

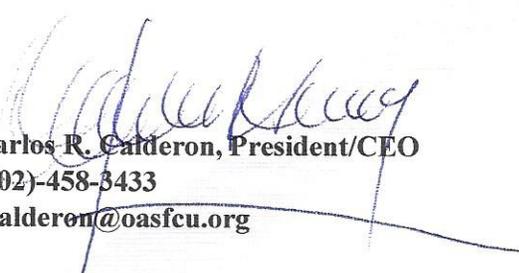
9. Trade, Industry or Profession (TIP) As a Single Common Bond – Expands the definition of a TIP charter to include employees of entities that have a strong dependency relationship with (and whose employees work directly with employees of) other entities within the same industry.

Recommendation: We strongly support this provision, allowing a number of TIP charters to serve vendors, contractors, or other groups closely associated with a particular Trade or Industry.

The positive rule changes put forth by the NCUA will give credit unions the ability to more fully operate and compete and serve member-owners in a safe and sound manner and provide competitive products and services.

We are fully supportive of the NCUA’s proposed rules on FOM and we hope our comments will be respectfully reviewed and considered as the final rules are formulated in the near future. Thank you for the opportunity to comment on the Proposed Rule.

Sincerely,


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