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Gerard S. Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314-3428

RE: Notice of Proposed Rulemaking Regarding Associational Common Bond

Dear Mr. Poliquin,

On behalf of Citizens Community Credit Union (CCCU), I appreciate the opportunity to provide comment to the National Credit Union Administration (NCUA) with regard to the proposed amendments to the Chartering and Field of Membership Manual regarding Associational Common Bond.

CCCU is a FISCCU located in Devils Lake, North Dakota. We serve over 11,000 members from 11 offices in very rural areas with small populations. In such a sparsely populated area it is difficult to survive let alone grow when areas to serve are not available due to severe restrictions on fields of membership.

I applaud the NCUA for taking such positive steps to reduce the unnecessary regulatory burdens that restrict us for providing the services to the members we serve. I fully support the NCUA's proposed rule to amend the Chartering and Field of Membership Manual.

Despite what others in the financial industry may argue, our credit union continues to operate for the same purpose and upon the same beliefs as those credit unions did when the Federal Credit Union Act was signed into law, namely, "This credit union is a member-owned, democratically operated, not-for-profit organization managed by a volunteer board of directors, with the specified mission of meeting the credit and savings needs of consumers, especially persons of modest means. The purpose of this credit union is to promote thrift among its members by affording them an opportunity to accumulate their savings and to create for them a source of credit for provident or productive purposes."

I believe that everyone should have the opportunity to be a member-owner of a credit union. This proposed rule will maximize access by removing undue burdens and restrictions on a Federal Credit Union's ability to provide services to consumers who are eligible for FCU membership, particularly those of modest means and those who may not currently be members of a credit union.

[citizens-cu.com](http://citizens-cu.com)

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Because of what we do for our membership on a daily basis, we frequently receive referrals from other financial institutions that know that our credit union will work to help people when those financial institutions can't or choose not to. It is unfortunate that, at times, we must turn these people away simply due to restrictions associated with field of membership rules.

As an example, an elderly lady from a town just outside of our FOM saw our consolidation advertisement. She boarded a bus from over 100 miles away and stopped in our office. She said she was referred to us after seeing the ad by another member who we had assisted in this manner. It was truly a sad event to be required to tell her there was nothing we could do for her simply because of a rule over which we had no control.

Thank you for this opportunity to share our comments and concerns.

Sincerely,

Darwin R. Brokke

President

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