



FEB01'16 PM 2:46 BOARD

January 25, 2016

Mr. Gerard Poliquin
Secretary of Board
National Credit Union Administration
1775 Duke Street
Alexandria VA 22314-3428

Mr. Poliquin,

On Behalf of SAC Federal Credit Union (SAC FCU), I am writing to you regarding the National Credit Union Administration's (NCUA) proposed rule amending the Chartering and Field of Membership (FOM) Manual, incorporated as Appendix B to part 701. I appreciate NCUA's initiative in this rulemaking to provide meaningful regulatory relief to credit unions and welcome the opportunity to provide comments on this proposal. The credit union industry has long advocated for FOM reform, and we appreciate the NCUA Board's support for modernizing the agency's FOM regulations for the first time in fifteen years.

The National Association of Federal Credit Union's continues to hear from its members that NCUA's FOM Rule and Regulations unnecessarily inhibit their ability to serve their communities and other consumers who want and need affordable financial services. While we acknowledge that legislation is necessary to resolve certain limitations of FOM rules, we support NCUA's attempt at regulatory relief by streamlining its chartering and FOM procedures, as well as removing many non-statutory constraints on FOM chartering and expansion.

SAC FCU is in favor of having the FOM rules updated to include the opportunity to request adding adjacent areas to a community consisting of a Single Political Jurisdiction, Core Based Statistical Area (CBSA), Combined Statistical Area (CSA) or Rural District after showing, based on subjective evidence, that the residents interact or share common interests.

Today there is a corridor between the Lincoln-Beatrice and the Omaha-Council Bluffs-Fremont statistical areas. We can say that individuals commute between the two Metropolitan and Micropolitan Statistical Areas (MSA) for work because we have had staff commute from Lincoln, Nebraska to work for SAC FCU located in Bellevue, Nebraska.

When looking at the Core Based Statistical Areas and Counties map as of February 2013 that identifies combined statistical Areas, it is clear that Nebraska is a relatively small populated state. There are a significant number of counties that are not identified as being included in an MSA.

We are a community chartered credit union and Membership is open to Douglas, Sarpy, Cass, Washington, and Saunders Counties in Nebraska, and Pottawattamie, Mills, and Harrison Counties, in Iowa. Our growth opportunity under the current field of membership rule is limiting membership growth opportunities. Being able to include counties that are adjacent to our current communities would provide significant opportunities for membership growth in the future.

Thank you very much for the opportunity to comment on this proposed regulation. I applaud the agency's willingness to amend the Chartering and FOM Manual to provide much-needed relief for the credit union industry. While I strongly support this proposal, I encourage the agency to consider the recommendation outlined above, as I believe these suggestions will meet the needs for credit unions. If I can be a source of any further information on this comment letter, please do not hesitate to contact me at gdeboer@sacfcu.com or by phone at (402) 829-6240.

Sincerely,



Gail DeBoer
Chief Executive Officer