



FEB09'16 PM 3:15 BOARD

February 1, 2016

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

Dear Mr. Poliquin,

On behalf of University First Federal Credit Union, I am writing to you regarding the National Credit Union Administration's proposed rule amending the Chartering and Field of Membership (FOM) Manual. University First Federal Credit Union's leadership believes the current restrictive guidelines have unnecessarily inhibited our ability to serve our community and consumers who want and need affordable financial services. We have long advocated for FOM reform. Current FOM regulations have not been updated in nearly fifteen years while technology and consumer banking activities have dramatically evolved. 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.

University First Federal Credit Union strives to provide convenient service to its members even though its efforts have been limited by FOM regulation. University First Federal Credit Union exemplifies the propriety of permitting the addition of residents in adjacent areas to access credit union services. University First Federal Credit Union serves residents of Salt Lake County, Utah. University First Federal Credit Union established two branches in Bountiful, UT in Davis County. Davis County is adjacent to Salt Lake County and Bountiful is basically adjacent to Salt Lake City and Salt Lake County. Numerous common interests are shared by the residents of Bountiful and Salt Lake County including employment, private transportation routes, public transportation, shopping, entertainment, newspapers, radio stations and television stations. University First Federal Credit Union's branch success exemplifies that the Bountiful and adjacent parts of Davis County should be added to the Salt Lake County membership. The proposed regulation would allow University First Federal Credit Union to add members who can be served by the two existing branches and who share numerous common interests with University First Federal Credit Union's existing membership.

Rule updates would allow credit unions to expand their services electronically and beyond the geographically limiting boundaries now placed on them. Students represent the majority of a University based credit union's membership. Too often, students move to new communities after graduation. Unfortunately, many believe they must terminate their membership because their credit union is restricted from expanding into their new neighborhood. Credit unions are innovative and have adopted new technologies which can serve members that relocate outside their original community. Unfortunately, current FOM regulations restrict credit union branch expansion, limiting their ability to fully serve their members financial needs. Credit Unions must be allowed, especially in an electronically connected society, to maintain a membership base where their members live.





We strongly support this proposal and encourage the agency to consider the recommendations outlined above. Furthermore, we believe these suggestions will meet the needs of credit unions. If I can be a source of any further information on this comment letter, please do not hesitate to contact me at jbuttars@ucreditu.com or by phone at (801) 463-3526.

Sincerely,

A handwritten signature in black ink that reads "Jack Buttars". The signature is written in a cursive style.

Jack Buttars, MBA, CFE
President/CEO
University First Federal Credit Union

