



February 2, 2016

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

FEB09'16 PM 3:14 BOARD

Dear Mr. Poliquin:

On behalf of SunState Federal Credit Union, 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 am sure you will receive hundreds, if not thousands of letters from bankers pushing for more restrictive FOM interpretations. To the contrary, I am sure you will receive hundreds, if not thousands of letters from credit unions supporting more lenient or broader FOM interpretations. The bankers will pretty much preach their party line, while the credit unions will preach theirs. For that reason, I will spare you another rendition of the same; instead I offer a few general comments I would like to register.

The bankers claim FOM is a reason for credit unions receiving preferred tax status; any way you look at that, it is just not true. Credit unions receive tax breaks because we operate as not-for-profit cooperatives with volunteer boards. The American people have the right to do business as part of a cooperative, just as banks have a right to make money for stockholders. Any changes you can make to FOM policy that allows more Americans to have a chance to join a credit union (or multiple credit unions, as the case may be) is a change in favor of the American consumer.

While I understand that current legislation dictates credit unions must have a Field of Membership outlining who they can serve, and that "common bond" still legally applies, the bottom line is that "common bond" is antiquated, archaic and no longer serves any significant useful purpose in modern financial institutions. Professional management, computers and underwriting models, a member's history with an institution, and credit reports are the tools that make a credit union safe and sound these days, not who knows who. By limiting the diversity among its membership, restrictive Field of Membership rules actually hurt a credit union's safety and soundness these days as opposed to helping it.

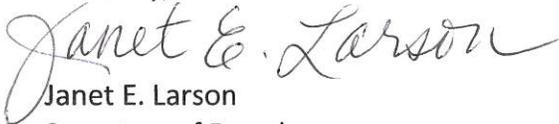
Finally, the banks claim broader interpretations of Field of Membership rules will harm their efforts to serve consumers. To that I respond, if the banks had been effectively and fairly serving consumers back when the credit union movement began, credit unions would not have been needed. I find it ironic that the bankers now cry foul any time a rule or regulation is proposed or approved in favor of a credit union, which is in fact in favor

of the American Consumer.

I believe it is the right of a bank to earn profits and pay them to stockholders. I believe it is the right of the American people, all of the American people, to belong to and build not-for-profit, cooperative credit unions. I do not believe for-profit banks have the right to force the American people to pay them a profit by maneuvering to limit who can join what credit union.

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 and Americans which do not currently have access to credit union membership. If I can be a source of any further information on this comment letter, please do not hesitate to contact me or my President/CEO Joe Akin of SunState Federal Credit Union, [Joe@SunStatefcu.org](mailto:Joe@SunStatefcu.org), or by calling Mr. Akin at (352) 381-5200.

Sincerely,

A handwritten signature in cursive script that reads "Janet E. Larson". The signature is written in black ink and is positioned above the typed name.

Janet E. Larson

Secretary of Board

Sunstate Federal Credit Union

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