

West Virginia Credit Union League, Inc.



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February 3, 2016

Mr. Gerard Poliquin, Secretary of the Board, NCUA

Dear Mr. Poliquin:

As President of the West Virginia Credit Union League whose membership includes 90 credit unions in the Mountain State with over 380,000 members, I appreciate the opportunity to comment on the NCUA Board's proposed rule on field of membership provisions. The WVCUL supports the proposal, which, if adopted as proposed, would ease unnecessary restrictions and remove barriers which currently limit a FCUs ability to more fully serve consumers in need of affordable financial services.

WV is mostly a rural state and our credit unions would significantly benefit from many of the provisions of the proposal concerning population limits and well defined local communities. The changes involving reasonable proximity through member access to on-line services also resonate with credit unions in our area due to our challenging geography. Taking advantage of technology would certainly help to create more opportunities for even greater credit union access.

Another portion of the proposal involves an expanded definition of a Trade, Industry, or Profession (TIP) charter and we welcome that change. Much of the industry in the state is interrelated and being able to incorporate these changes would be very beneficial to those credit unions wishing to exercise this option.

Any changes that could be made within the statutory authority of NCUA would most certainly be of great benefit to those potential members in WV. With a market penetration rate in the low 20's, there are thousands of West Virginians who could begin to achieve a greater degree of financial independence if they could become eligible for and begin using the services of a credit union. This proposal could allow for that to happen.

Thanks for the comment process and for the Board's willingness to propose such substantive changes to the field of membership rules.

Sincerely,

Kenneth R. Watts, President
West Virginia Credit Union League
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