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Marcus B. Schaefer
President/CEO

February 8, 2016

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

Re: Comments on the NCUA's Proposed Field of Membership Rulemaking

Dear Mr. Poliquin:

I am writing on behalf of Truliant Federal Credit Union in response to the NCUA's proposed field of membership (FOM) rulemaking. Truliant Federal Credit Union is a \$1.9 billion credit union serving over 190,000 members in and around North Carolina.

Truliant is a multi-occupational group credit union that welcomes FOM regulatory relief. The current FOM rules primarily stem from rulemaking that is almost 20 years old and does not reflect the economic realities of modern financial institutions. Truliant appreciates the efforts to update these critical regulations for the future growth of small, mid-size and large credit unions.

As a multi-occupational charter, Truliant is particularly interested in regulatory relief in applying for and adding select employee groups to our FOM. Two items stand out to us. First, the proposal to revise the definition of service facility would go a long way to recognizing the modern reality of how people access and use their credit union. A growing portion of our membership rarely sees the need to go into a branch or other physical location except when they need face-to-face financial guidance. The revised definition of service facility recognizes this reality. Second is the identification and adding of underserved areas to a credit union's FOM. As a provider of affordable financial services for over 60 years, Truliant supports making it easier to serve the unbanked and underbanked populations in the United States through sensible revisions to the underserved area regulation.

Truliant also supports streamlining the determination of stand-alone feasibility for groups with more than 3,000 members. The NCUA's proposal allows a letter from proposed groups of 5,000 or less stating they do not have the available interest and resources to start a credit union to be added as a select employee group. Based on our experience adding over 1,000 SEGs over the past 30 years, we support a change but believe the number of potential members for this type of streamlined determination should be at least 10,000 persons as opposed to the 5,000 person limit in the proposal.

Mr. Gerard Poliquin

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The proposal looks to amend several other areas relating to multiple group charters including inclusion of office/industrial park tenants, inclusion of select employee group contractors, and other persons eligible for credit union membership. Truliant supports all of the proposed changes in these areas as well.

The NCUA also proposed changes to the Community and Trade Industry or Profession Charters. Truliant supports the modernization of the Community and TIP Charter for the health of all credit unions. Specifically, we would support the following concepts outlined in the proposal:

For Community Charters:

- The tailored application of the Core Based Statistical Area Population Limit
- Allowing "Combined Statistical Areas" as a Well-Defined Local Community
- Allowing Congressional Districts to serve as a Well-Defined Local Community
- Adding Adjacent Areas to a Well-Defined Local Community
- Raising the Rural Population Limit to 1 million persons

For TIP Charters:

- Clarifying the definition of Trade Industry or Profession

Truliant also encourages the NCUA to reevaluate the retaining of select employee groups for credit unions converting to a community charter and consider ways to broadly define an emergency merger so that credit unions do not reach a level of distress that makes them unattractive to potential merger partners.

We appreciate the efforts made by the NCUA to improve the rulemaking process with a proposed rule and hope that the comments provided from Truliant and other credit unions will further enhance the process. Please call me at (336) 293-2001 if you have any questions.

Sincerely,



Marcus B. Schaefer

President/CEO

Truliant Federal Credit Union