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February 3, 2016

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

Re: Field of Membership Proposed Rule

Dear Mr. Poliquin:

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 relief to credit unions and also appreciate the opportunity to provide comments on this proposal. The credit union industry has long advocated for FOM reform. NCUA's Board has shown support on this issue and it is much appreciated.

I understand that legislation is necessary to resolve certain limitations on FOM rules, this proposal represents an updated approach to keep pace with changes in state laws and technology. It will provide needed regulatory relief by streamlining NCUA's chartering and FOM procedures, as well as removing many non-statutory constraints on FOM chartering and expansion.

Due to the vast growth of technology and digital communication platforms, credit union members and potential members are spread across diverse geographic areas. Federal credit unions and members should not be penalized for adopting the use of these technologies to grow and serve the membership. I would like to emphasize that I strongly support NCUA's initiative to include online financial services into the definition of "service facility."

I suggest that credit unions be allowed to provide more information to NCUA to support why an area is underserved which could include metrics such as *Home Mortgage Disclosure Act (HMDA)* data and other local economic factors including poverty rates, unemployment rates and median area family income.

I do appreciate NCUA's initiative in this rulemaking to simplify the determination of stand-alone feasibility. I believe that NCUA should only require overlap analysis and the standard application process when federal credit unions' business plans expect more than 5,000 *actual* members, rather than merely the *potential* for 5,000 members.

Thank you for allowing me the opportunity to comment on this proposed regulation. I appreciate the agency's willingness to amend the Chartering and FOM Manual to provide relief needed for the credit union industry. I do strongly support this proposal, but I request your consideration of the recommendations outlined above which I believe these suggestions will meet the needs for credit unions.

Very truly yours,

Ascend Federal Credit Union

A handwritten signature in black ink, appearing to read "Peggy Stubblefield", written over a horizontal line.

Peggy Stubblefield
Chief Human Resource Officer/SVP