

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:

As the Senior Vice President and Chief Financial Officer of Ascend Federal Credit Union, a \$1.8B federally chartered credit union serving over 157,000 members, 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 regulatory relief to credit unions and welcome the opportunity to provide comments on this proposal. The credit union industry has long advocated for FOM reform and I appreciate the NCUA Board's support on this issue.

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

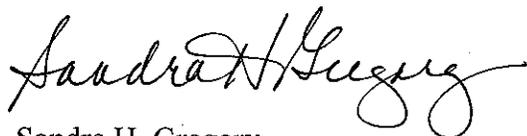
Due to the expansive growth of technology and digital communication platforms, today's credit union members and potential members are spread across diverse geographic areas. Consumers and federal credit unions should not be penalized for adopting the use of these technologies to serve and grow their memberships. Therefore, I strongly support NCUA's initiative to incorporate online financial services into the definition of "service facility."

To improve the ability of a credit union to evidence why an area is underserved, I suggest the NCUA consider other metrics, such as *Home Mortgage Disclosure Act* (HMDA) data or local economic factors, including poverty rates, unemployment rates and median area family income.

While I appreciate NCUA's initiative in this rulemaking to streamline the determination of stand-alone feasibility, I firmly 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 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. While I strongly support this proposal, I encourage the agency to consider the recommendations outlined above, as I believe these suggestions will meet the needs for credit unions.

Kind regards,

A handwritten signature in cursive script that reads "Sandra H. Gregory". The signature is fluid and elegant, with the first letters of each word being capitalized and prominent.

Sandra H. Gregory
Senior Vice President and Chief Financial Officer