January 28, 2016

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

Dear Mr. Poliquin,

My credit union, Affinity Federal Credit Union, is a $2.3 billion credit union with 133,000+ members, which was chartered in 1935 to serve members' financial needs. It has a long and proud history of serving its members. As a member of this cooperative, I believe that expanding its availability of membership strengthens the organizations ability to serve my and other member's needs. I appreciate the opportunity to provide comments on the NCUA's revised Field of Membership rule.

**Stand Alone Feasibility of Groups Greater Than 3,000:**

If a large employer states that it does not want to start its own credit union, it should not be forced to explain why. The existing practice of requiring an organization with just a few thousand employee/members to consider starting its own credit union runs counter to NCUA's safety and soundness policies. A letter from the owner or president of the organization stating that the organization does not want to start its own credit union should suffice.

**"Reasonable Proximity" Definition:**

Thank you for proposing that a credit union's ability to provide online financial services be included as a definition of a service facility, essentially expanding the current guideline used by NCUA. I believe this proposal should not be limited to a specific geographic area within which a credit union can apply the online financial services "branch" definition. Furthermore, this provision should be extended to underserved areas that, under the current proposal, will still require a physical branch to be placed within the underserved area. Not addressing this discrepancy implies that residents of a low income area cannot or should not be able to access financial services via a laptop or a mobile device.

**Inclusion of Contractors and Other Persons Eligible & Inclusion of Office/Industrial Park Tenants:**

As an advocate for credit unions I encourage all of my friends and family, some of which currently don't have access to credit unions, to use one as their primary financial institution. Thank you for expanding the number of opportunities for my friends, family, and community to join credit unions like Affinity Federal Credit Union. In addition, as a strong supporter of veterans I am proud to see the NCUA

supporting them as well through the inclusion of dishonorably discharged veterans as a group that can be included for eligibility in a credit union's charter.

**Underserved Areas – Concentration of Facilities Test:**

One of the central missions of the credit union movement is to serve people of modest means. In the spirit of encouraging more financial institutions to serve underserved areas, please consider changing the NCUA's chartering policy to allow a community chartered credit union to add an underserved area outside of its community. This was previously permissible from 1994 until the interpretation changed by the NCUA in 2005. As this statute has been interpreted by the NCUA both ways, and the statute does not strictly prohibit the earlier interpretation, the ability of community chartered credit unions to add an underserved area outside of its community should be restored.

Thank you very much for the opportunity to comment on the NCUA's Field of Membership Rule. I respectfully encourage NCUA to consider some of the recommended improvements to the proposal contained herein. With the right changes, this rule can become a source of long term viability of the credit union charter.

Kind regards,

Scott Witherspoon
70 Green Terrace Way
West Milford, NJ 07480

Cc: Senator Robert Menendez
Senator Cory Booker
Congressman Scott Garrett