

February 8, 2016

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

Re: Comments on Proposed Rulemaking for Part 701; Chartering and Field of Membership Manual  
RIN: 3133-AE31

Dear Mr. Poliquin,

I am writing on behalf of San Diego County Credit Union's (SDCCU) over 308,000 members. We appreciate the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposal to modernize and comprehensively amend the chartering and field of membership (FOM) rules.

SDCCU fully supports the proposed changes that will improve consumer's ability to enjoy credit union services, and advance the dual chartering system through incentive for our state regulators to similarly modernize. The following comments are respectively submitted in support of the proposed amendments and suggestions for further improvement.

#### **Community Common Bond**

We support the proposed amendments to the community common bond. However, the population limit for a statistical area should be eliminated or set to equal the most populous singled political jurisdiction in the United States for increased efficiency and ease of implementation.

#### **Multiple Common Bond**

The NCUA has proposed to revise the definition of a "service facility" for multiple common bond credit unions to include online internet channels, such as transactional website - one that meets the current transactional requirements of shares accepted for deposit, loan applications accepted, or loans disbursed.

SDCCU strongly supports modernization to reflect the various ways our members conduct their business with the credit union. The definition for a service facility should include electronic access to conduct business.

Our credit union members currently may choose to electronically conduct transactions, including opening a loan application. The availability of online banking, mobile banking, and similar electronic services render a physical service facility to be unnecessary.



## Closing Remarks

In closing, SDCCU supports the proposed amendments to modernize the federal charter. We believe these efforts will benefit the industry overall, by strengthening the dual-charter system. Thank you for the opportunity to respectfully offer our comments.

Sincerely,

A handwritten signature in black ink that reads "Teresa a Halleck". The signature is written in a cursive, flowing style.

Teresa Halleck  
President and CEO