

February 08, 2016

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

RE: Comments on Notice of Proposed Rulemaking for Field of Membership - RIN: 3133-AE31

Dear Gerald Poliquin,

The National Credit Union Administration Board (NCUA) is proposing to amend Part 701 of its rules and regulations to make revisions to the agency's chartering and Field of Membership manual. I am writing on behalf of TruMark Financial Credit Union, which serves five counties in southeast Pennsylvania, including the Greater Philadelphia Community, to express support for NCUA's proposed field of membership rule.

TruMark Financial Credit Union is a state-chartered, community credit union in Pennsylvania. We provide financial services and products to individuals who live, work, worship, go to school, and volunteer in Philadelphia and the five surrounding counties in southeast Pennsylvania. Although we are state-chartered, we support NCUA's proposed Field of Membership changes because we believe increased accessibility to affordable financial products and services for all individuals, regardless of where they are located, is vital for the growth of the economy and growth for the credit union industry. NCUA's proposal attempts to modernize the existing Field of Membership rules and provide greater flexibility to credit unions to provide financial products and services to people that share a common bond. We support this modernization of the Field of Membership rules.

One area of interest in the proposal focuses on the inclusion of select employee group contractors in a multiple common bond. TruMark Financial was once a multiple SEG credit union, but at that time was unable to offer credit union services to contractors, whether they were independent or otherwise. Single SEG credit unions were able to offer services because of the "strong dependency relationship" test. Today, it would be beneficial for multiple SEG credit unions to have the same ability as a single SEG credit union to offer credit union services to contractors that have a strong dependency relationship to the sponsor. We believe this is an important component of growth for multiple SEG sponsors.

We applaud NCUA's efforts to improve the Field of Membership rules with the goal of allowing consumers to have more choices for financial products and services.

Sincerely,

Vincent Market
EVP/CFO
TruMark Financial CU

cc: CUNA, CCUL