



FEB09'16 PM 3:13 BOARD

January 29, 2016

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

RE: Proposed Chartering & Fields of Membership Change – Appendix B of Part 701

Dear Mr. Poliquin,

Thank you for the opportunity to comment on this important issue.

We applaud NCUA for recognizing recent changes in technology, regulation and competition which outlines the need to update the current field of membership requirements in place for decades.

In a highly mobile, hyper-connected information society, physical and social boundaries are becoming more complex. No longer can we rely exclusively on physical branches to define a service area. Businesses are becoming more decentralized making traditional workplace definitions difficult to define. Non-deposit institutions compete in the same markets with fewer restrictions and banks have grown exponentially both domestically and internationally.

To compete in this environment, we agree with your outlook that credit unions need equal access to markets. Your innovative and courageous proposals will help insure future generations have access to a vibrant credit union option.

The Aloha Pacific Federal Credit Union is a \$750 million institution and we support the proposed changes. Consumers deserve choice on where they obtain financial services and we want to continue to be part of that choice. The proposed rule would provide federal credit unions the opportunity to diversify their field of membership, as opposed to functioning within its current limitations.

Thank you for the opportunity to hear our thoughts.

Sincerely
Aloha Pacific Federal Credit Union

A handwritten signature in black ink, appearing to read "Vince J. Otsuka".

Vince J. Otsuka
President & CEO

Cc: Hawaii Credit Union League