

February 03, 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 CME Federal Credit Union, which serves eight counties in Central Ohio to express support for NCUA's proposed field of membership rule.

CME Federal Credit Union supports the proposed rule changes on the basis that credit unions have a proven track record of helping those that could not be served. Founded in 1935 by our public servants in Franklin County, we expanded our charter in 2014 to serve those outside of our defined singular county. CME expansion was a result of direct request from our members to go outside our one county. After a thorough process with NCUA, CME was granted the expanded community charter. Hence, CME believes all consumers or member-owners would be better served if there were no limits to membership other than a regulator-monitored business reason. As well as the ability of that specific credit union to serve those that seek service.

CME Federal Credit Union as well as other credit unions, were formed under the philosophy of people helping people, communities coming together to help their neighbors. Firefighters helping firefighters, officer to officer; with modern technology boundaries are no longer defined by lines on a map. As communities grow, so too does the definition. Defining a community used to be easy people who work together, live in the same neighborhood, or attend the same church or school. But in today's increasingly interconnected world most of us are becoming a part of multiple communities, at times even communities that are separated geographically. The current rules result in credit unions turning away potential members, merely because they live across an artificial boundary drawn on a map, even if people living on both sides of that boundary work together and interact on a daily basis. This revised rule will allow credit unions to expand their field of membership across these invisible lines to new communities, which will enable access to quality financial services for all consumers.

Thank you for the opportunity to comment on this proposed rule and for considering our views on Field of Membership. We urge the agency to approve a final rule soon so that all consumers will have access to a not-for-profit financial cooperative because credit unions will gain regulatory relief and field of membership flexibility enabling to

meet consumer demand for such an alternative.

Sincerely,

Jeffery Carpenter  
President/CEO  
CME Federal Credit Union

cc: CUNA, CCUL