



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

Submitted electronically on NCUA website
Re: RIN. 3133-AE31

February 01, 2016

Dear Mr. Poliquin:

Thank you for the opportunity to comment on the National Credit Union Administration's (NCUA) proposed changes to the Charter and Field of Membership Manual. On behalf of the Nebraska Credit Union League I appreciate the steps NCUA has taken within this proposal to provide greater flexibility to the field of membership process. The Nebraska Credit Union League serves sixty-three (63) credit unions and their more than 480,000 credit union members. Of those sixty-three credit unions, forty-nine (49) are federally chartered. This proposed rule will provide federally chartered credit unions in Nebraska a greater possibility to serve those who share a common bond. The amended "reasonable proximity" standard, the ability for a credit union to use Congressional Districts as a Well-Defined Local Community (WDLC), and the increase in population limit for rural districts are examples of helpful changes to recognizing common bonds that are important to Nebraska credit unions. The League supports this proposal and hopes NCUA will continue to evaluate additional measures to provide flexibility when demonstrating a common bond.

The League strongly supports the change to the "reasonable proximity" standard and amended definition of a service facility that would include access through a transactional website or certain mobile platforms. Technology has changed dramatically since NCUA last updated the FOM requirements. Nebraska residents are spread across a large area and continue to increase their use of technology to access financial services. The League encourages NCUA to continue to evaluate how technology has changed in terms of the consumer's use of financial services as well as how it has expanded common bonds.

The League appreciates NCUA's recognition that a changing environment and developments in the chartering process have impacted classifications of common bonds based on location. The League requests that NCUA continue evaluating additional common bond opportunities as they have under the proposal when recognizing Congressional Districts and allowing a portion of a Core Based Statistical area to be classified as a WDLC. Allowing these clearly defined areas of a common bond to potentially qualify as a Field of Membership will help ensure that Nebraska credit unions can evaluate and meet the needs of their community.

The League encourages NCUA to continue to evaluate the common bond options and ways to streamline the field of membership application process especially for rural areas. Changing the population limit for rural districts from 250,000 to 1 million and allowing rural areas that are immediately contiguous to Nebraska are changes that will benefit the industry and credit union work in rural areas.

The changes outlined in NCUA's proposal will provide greater flexibility but maintain the common bond structure. The League appreciates NCUA's consideration of changes overtime that have impacted common bonds and the field of membership chartering process. The Nebraska Credit Union League encourages NCUA to continue exploring opportunities to create additional flexibility in the Manual to accurately reflect common bond groups throughout Nebraska.

Sincerely,

A handwritten signature in cursive script that reads "J. Scott Sullivan". The signature is written in black ink and is positioned below the word "Sincerely,".

J. Scott Sullivan
President/CEO