

**From:** [Robert Farmer](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Comment of Field of Membership Proposal  
**Date:** Wednesday, February 03, 2016 7:23:09 PM  
**Attachments:** [image001.png](#)

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**2/03/2016**

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

Dear Mr. Poliquin,

I am writing in my capacity as [title] of Missoula Federal Credit Union (MFCU). I've worked at the credit union for 17 years and been a members for 17 years. I am writing in support of NCUA's efforts to modernize the Chartering and Field of Membership (FOM) Manual, incorporated as Appendix B to part 701. Thank you very much for the opportunity to provide comment on the proposal.

Missoula Federal Credit Union is Montana's second largest credit union and the state's largest Community Development Financial Institution (CDFI). Community development and a commitment to reaching underserved people is at the core of our mission. We manage approximately \$425 million in total assets and serve roughly 45,000 people. We are a community charter.

While I am supportive of all of the proposed rule changes that would affect community charters a few of the proposals and opportunities are especially relevant to our circumstances.

- **Congressional District:** I support the proposal to allow a Congressional District to be used as a WDLC.
- **Rural District Population Limits:** I support the proposal to increase the rural district population limit from 250,000 to 1 million.
- **Narrative Evidence in Defining a WDLC:** I support combining the current statistical approach with alternative *de novo* narrative approaches independent of the limitations inherent with Core Based Statistical Areas, Combined Statistical Areas, Metropolitan Statistical Areas, etc.
- **Exclusion of Non-Depository Institutions and Non-Community Credit Unions When Calculating the Concentration of Facilities Ratio:** I support the proposal to exclude non-depositories and non-community credit union facilities when calculating the concentration of facilities ratio used to determine whether an area is underserved.
- **Reasonable Proximity through Members' Online Access to Services:** I support the proposal to include within the definition of "service facility" transactional websites and mobile platforms that permit members to deposit funds, submit loan applications and receive loan funding remotely. This expanded definition of "service area" should apply to all federal charter types, not just multiple common bonds.

I applaud the agency's efforts to modernize FOM rules and regulations. The changes proposed will enable credit unions like MFCU to expand their positive social impact and to strengthen their financial positions by opening new markets and spreading risk. Thank you for undertaking this effort and for inviting comment.

Sincerely,

Robert Farmer, SHRM-SCP, MBA  
Senior Vice President of Human Resources

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