

February 2, 2016

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

Re: Proposal to Modernize Chartering and Field of Membership (FOM) Manual

Dear Mr. Poliquin:

We are SunState Federal Credit Union located in North Central Florida serving five "low" income counties with over 30,000 in membership, approximately \$340 million in assets and a Low-Income Designated credit union. On behalf of SunState Federal Credit Union, I am writing to you regarding the National Credit Union Administration's (NCUA) proposed rule amending the Chartering and Field of Membership (FOM) Manual, incorporated as Appendix B to part 701.

I am sure you will receive hundreds, if not thousands of letters from bankers pushing for more restrictive FOM interpretations. To the contrary, I am sure you will receive hundreds, if not thousands of letters from credit unions supporting more lenient or broader FOM interpretations. The bankers will pretty much preach their party line, while the credit unions will preach theirs. For that reason, I will spare you another rendition of the same; instead I offer a few general comments I would like to register.

The bankers claim FOM is a reason for credit union's receiving preferred tax status; any way you look at that, it's just not true. Credit unions receive tax breaks because we operate as not-for-profit cooperatives with volunteer boards. The American people have the right to do business as part of a cooperative, just as banks have a right to make money for their stockholders. Any changes you can make to FOM policy that allows more Americans to have an opportunity to join a credit union (or multiple credit unions, as the case may be) is a change in favor of the American consumer. Competition is a playing field leveler, and the more competition, the better it is for the consumer.

While I understand that current legislation dictates credit unions must have a Field of Membership outlining who they can serve, and that "common bond" still legally applies, the bottom line is that "common bond" is antiquated, archaic and no longer serves any significant useful purpose in modern financial institutions. Professional management, computers and underwriting models, a member's history with an institution, and credit reports are the tools that make a credit union safe and sound these days, not who knows who. By limiting the diversity among its membership, restrictive Field of Membership rules actually hurt a credit union's safety and soundness these days as opposed to helping it.

Finally, the banks claim broader interpretations of Field of Membership rules will harm their efforts to serve consumers. To that I respond, if the banks had been effectively and fairly serving consumers back when the credit union movement began, credit unions would not have been needed. I find it ironic that the bankers now cry foul any time a rule or regulation is proposed or approved in favor of a credit union, which is in fact in favor of the American consumer.

I believe it is the right of a bank to earn profits and pay them to stockholders.

I believe it is the right of the American people, all of the American people, to belong to and build not-for-profit, cooperative credit unions.

I do not believe for-profit banks have the right to force the American people to pay them a profit by maneuvering to limit who can join or be a member of a credit union.

Thank you very much for the opportunity to comment on this proposed regulation. I applaud the agency's willingness to amend the Chartering and FOM Manual to provide much-needed relief for the credit union industry and Americans which don't currently have access to credit union membership. If I can be a source of any further information on this comment letter, please do not hesitate to contact me at Joe@SunStatefcu.org, or by phone at (352) 381-5200.

Sincerely,

Joseph L. Akins
President/CEO
SunState Federal Credit Union
Charter Number: 11789