

**From:** [Tina Cross](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [Yashewski, Suzanne](#)  
**Subject:** CT Waco Federal Credit Union - Comments on Associational Common Bond and Field of Membership Proposal  
**Date:** Monday, June 30, 2014 2:52:49 PM

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

*Re: Comments on Associational Common Bond and Field of Membership Proposal*

*Dear Mr. Poliquin,*

*This represents the views of CT Waco Federal Credit Union regarding the NCUA's proposal on revisions to the Associational Common Bond and Fields of Membership. CT Waco Federal Credit Union is a \$6 million credit union located in Waco, Texas. We serve 1326 members from multiple SEGS located within the Central Texas Industrial District. CT Waco Federal Credit Union appreciates the opportunity to comment on the NCUA's proposal.*

*CTWFCU is in support of revising the Field of Membership Manual. However CTWFCU is in agreement with some points of the proposal and is in disagreement with others.*

*We are in support of the proposed automatic approval provision. As a small credit union, we welcome changes that can streamline the process of adding eligible membership groups to our FOM. We are in support of The NCUA's proposal for automatic approval of religious organizations, churches, homeowner associations, scouting groups, electric cooperatives, labor unions and associations that have a mission based on preserving or furthering the culture of a particular national or ethnic origin. We are in support of expanding this list to include similar groups such as 4H Clubs, FFA Groups, social clubs, historical societies and other similar groups.*

*We disagree with the NCUA's interpretation of immediate proximity. Technologies including direct deposit, ATM and debit cards, web sites and mobile apps have made the 25 mile proximity requirement too restrictive.*

*We disagree with the requirement that an association must have operated for a full year prior to requesting inclusion into a credit union's Field of Membership. This restriction could undo all the good created by streamlining the process. I.E.: A new association, formed today, would not be eligible for membership in any credit union for a full year. But they do have to conduct their business, so they would likely end up at a bank.*

*We feel that associations that already exist within any credit union's field of membership should be preserved and grandfathered in. Any attempt to remove existing membership groups would be unfair to the member and to the credit union. It would reflect badly on the reputation of the industry as a whole.*

*Thank you for the opportunity to comment on this proposal.*

*Sincerely,*

*Tina Cross*

*Manager*

*CT Waco Federal Credit Union*

*P.O. Box 20245*

*Waco, TX 76702*