

December 16, 2015

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,

Introductory paragraph:

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 today on behalf of Combined Federal Credit Union, which serves multiple SEGs in Garland and Montgomery Counties in Arkansas, to express support for NCUA's proposed field of membership rule.

Combined Federal Credit Union supports NCUA's proposed FOM changes. The number of credit unions has been shrinking in the United States for many years. Even though we are serving more members than ever before, credit unions still make up a very small portion of the financial service businesses in the United States. Part of this is due to our restrictive membership requirements.

Expanding the area we can serve will have an impact on this credit union. Because Arkansas is a mostly rural state, the use of CBSAs can provide us access to a wider area in which we can offer our services. The same will be true for increasing the population limit for rural districts.

We also support the use of Congressional districts as well-defined local community for much the same reasons. We simply need access to wider field of membership possibilities if we hope to grow and survive.

Including office and industrial park tenants in a multiple common bond will definitely assist our multiple SEG type membership and allow us to add more businesses through this process in a combination of businesses. This would very much streamline the application and membership approval process for multiple SEG credit unions. The same will be true for the proposed streamlined determination of stand-alone feasibility for groups between 3,000 and 5,000 members.

Please move forward quickly with this proposed regulation change. Credit unions definitely need more opportunities to expand their membership base. Our survival depends on it.

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 credit unions can take advantage of the regulatory relief and field of membership flexibility in the proposed rule.

Sincerely,

Rebecca Brosius
Chief Executive Officer
Combined FCU

cc: CUNA, CCUL

