

**From:** [Fran Kurz](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Comments on Proposed Rule, Appendix B of Part 701  
**Date:** Tuesday, December 15, 2015 5:10:06 PM

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Dear Secretary of the Board Poliquin,

The National Credit Union Association's proposed rule reforming the Field of Membership regulations is much appreciated. These rules have not been updated in some time and are no longer adequately serving the credit union industry. In fact, they are limiting member service and our ability to serve our communities and select employee groups. The number of federally chartered credit unions has been decreasing over the last several years and the restrictive field of membership rules play a large part in that trend. Bringing some common sense changes to the rules to bring them into current times makes a lot of sense and we support the NCUA's efforts in this regard.

Sincerely,

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