

**From:** [janice James](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Comments on Proposed Rule, Appendix B of Part 701, FOM  
**Date:** Tuesday, December 15, 2015 2:30:11 PM

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Dear Secretary of the Board Poliquin,

I support the proposed change to the NCUA Field of Membership rule. I believe that the proposal represents a responsible interpretation of the Federal Credit Union Act that will facilitate credit union outreach, as Congress envisioned. In addition, I believe the proposal will support dual chartering. With the removal of some of the current regulatory limits on federal credit union field of membership expansions, as proposed, the value of the federal charter will be enhanced. These enhancements are needed in light of revisions in field of membership provisions that several states have made for state credit unions.

Sincerely,

janice James  
1251 13th St  
Columbus, GA 31901