

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 on behalf of [your credit union name], which serves [your field of membership] to express support for NCUA's proposed field of membership rule.

Letter Body:

Why does your credit union / league support NCUA's proposed FOM changes? Bayer Heritage supports NCUA's proposed FOM changes because it will allow us to reach thousands of members in our market areas that do not currently have the opportunity for "credit union" service.

How will the changes in this proposed rule impact your credit union? Many considered investments in facilities, technology and services simply weren't viable under the current regulatory environment. With the proposed changes under consideration this would no longer be the case.

Describe how this proposed regulation will make the use of a Core Based Statistical Area (CBSA) more flexible. What else can NCUA do to enhance the use of CBSA? Bayer Heritage is satisfied with the proposed regulation's use of CBSA.

How will the increase in population limit for rural districts from 250,000 to 1 million help your credit union serve members? In a rural market such as ours, it would greatly enhance our ability to serve the lower wage working class which dominates our market in the West Virginia panhandle and southeastern Ohio area, the heart of Appalachia.

Should NCUA increase the population limits for the use of the CSA and CBSA to more than 2.5 million? CUNA has advocated for 10 million, which is approximately the population of the largest single political jurisdiction that NCUA has approved. Absolutely! 10 million would not be out of the question as far as we are concerned. All this does is provide a greater opportunity for credit union membership to a citizenry that sorely needs it.

Do you support the use of Congressional districts as well-defined local community? This is an innovative way to utilize readily identifiable areas already in use. We support this concept.

Under the current regulation, when a credit union seeks to serve an underserved area, NCUA calculates a proposed area's concentration of facilities ratio to meet a statutory requirement that a proposed area be underserved by other depository institutions. What other alternative methods can NCUA use to identify underserved areas? We would suggest the "sole" use of "credit union access" in a region targeted as possibly "underserved". Credit unions are "unique" and deserve their exclusive status when analyzing the underserved.

Do you support the inclusion of office and industrial park tenants in a multiple common bond? Anything that will enhance the access to credit unions by more of the U.S. population is a "plus", so yes.

Do you support NCUA proposed streamlined determination of stand-alone feasibility for groups between 3,000 and 5,000 members? Streamlining this process is needed, so yes, of course!

Summary of your position:

Bayer Heritage is in full support o NCUA's FOM proposal. We believe it is absolutely essential to the future health and viability of the credit union industry/movement. Please do not be influenced from competing groups that cry "foul". It is through their opposition that the "rightness" of this proposal is confirmed.

Closing paragraph:

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,

Robert Burrow  
President/CEO  
Bayer Heritage FCU

cc: CUNA, CCUL