

January 05, 2016

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,

I am writing on behalf of CalCom Federal Credit Union (CalCom), \$63-million in asset credit union serving 8,200 members of multiple common bonds within the Los Angeles County area. We are expressing our support towards the proposed amendments by the National Credit Union Administration (NCUA) Board to the Chartering and Field of Membership rules. The proposed amendment will benefit all credit unions and will strengthen the Federal charter. What stood out to us are the following:

- Amending the definition of “service facility” to include access through an online internet channel is beneficial to this credit union. Our credit union serve primarily healthcare practitioners. Doctors working for one of our SEG Sponsor may operate a separate medical office that does not necessarily fall within our field of members or the current “reasonable proximity” rule. These medical offices may employ 5 to 20 people. This amendment to the rule make sense for our purpose and the minimum requirement of being able to accept shares for members’ accounts, accepting loan application or dispersing loans are reasonable requirements to effectively serve a potential group.
- The inclusion of Office or Industrial Park tenants in multiple common bond and the streamlined determination of stand-alone feasibility groups between 3,000 and 5,000 will be beneficial to our credit union as well. This amendment are “make sense” rules that will help credit unions grow their membership and provide more credit union access to more consumers.

We thank you for allowing us the opportunity to express our comment on this proposed rule and for considering our views. We encourage the NCUA Board to act on approving this rule as soon as possible so that we open up the opportunities of membership to more consumers.

Sincerely,

Jon Hernandez
CEO
CalCom FCU

cc: CUNA, CCUL