

From: [Chuck Garner](#)
To: [Regulatory Comments](#)
Subject: Chartering and Fields of Membership
Date: Friday, January 29, 2016 6:30:07 PM

Dear Secretary of the Board Poliquin,

It must be the goal of the National Credit Union Association to best enable credit unions to effectively serve their members and provide them with solid products and services. The financial crisis showed that institutions, such as credit unions, are the responsible actors that care about serving their members as opposed to making a profit at the expense of economic stability. I applaud the efforts of the National Credit Union Administration to help credit unions better serve consumers, and as such, I support the Board's proposed rule change that will enhance consumers' ability to choose a credit union as their financial partner.

A major issue with current NCUA field of membership rules is that they are much more restrictive than most rules for state chartered credit unions and community banks. Oregonians Credit Union experienced this first hand over the past decade as state community chartered credit unions with much broader fields of membership out performed us along with the community banks in our area. So to compete on a level playing field, we converted from a federal charter to a state charter at the end of December, 2015. This conversion may not have been needed had federal and state rules been more aligned.

The Board should move forward with these changes. I believe that these changes conform to the Federal Credit Union Act as well as the Credit Union Membership Access Act of 1998. In addition, the Board should not be affected by comments organized by banks, which do not have the best interests of consumers and the country's economic health at heart. Our government needs to pursue thoughtful policymaking that is driven by what is best for consumers, and not what is best for big bank shareholders. This rule change is the right approach. Please finalize your proposal.

Sincerely,

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