

Please Do Not Reply To This Email.

Public Comments on Chartering and Field of Membership Manual , : =====

Title: Chartering and Field of Membership Manual ,
FR Document Number: 2015-30069
RIN: 3133-AE31
Publish Date: 12/10/2015 12:00:00 AM

Submitter Info:

First Name: Jordan
Last Name: Falci ani
ZIP/Postal Code: 19073
Email Address: jordan@falci ani .com
Organization Name: null

Comment: First, I would like to voice my support for section C.1 of this proposed rule change. "Exclusion of Non-Depository Institutions and Non-Community Credit Unions from Concentration of Facilities Ratio." As noted in the proposed rule change, the inclusion of non-community credit unions would distort the calculations of NCUA to determine what areas can be considered underserved by multiple common bond credit unions. I would also like to voice my support for the second component of this proposed rule change. That is, data reflecting the presence of non-depository institutions, such as trust companies, which do not accept deposits from the general public.

These two types of institutions are not in fact open to accepting business from the general population and their inclusion in the concentration of facilities ratio leads to a decline in service in underserved communities. I am also in support of excluding these two types of institutions as part of a recalculation of the ratio in the event that the initial facilities ratio fails to identify a proposed area. I support the way that this method conserves the resources of the NCUA.

Under section C.2 I would like to voice my support for proposed rule change, "Alternatives to Identify Areas Underserved by Other Depository Institutions." I support alternatives to the ratio of facilities calculation, including the creation of "underserved counties" and the proposed rule change permitting credit unions to create their own metrics and submitting them as evidence of underservice in a proposed area.

As invited by the board in the proposed rule change I would like to submit some other ideas for methodologies that could be used to measure whether or not an area is underserved. The proposed change includes metrics such as data from the Community Reinvestment Act, data from the Office of the Comptroller of the Currency, and the Board of Governors of the Federal Reserve System. These would all be great sources of data that credit unions should be able to use to claim that they are in an underserved area.

I would like to include data such as percentages of students of receive free and reduced lunch, immigration statistics, or information about banking habits collected by non-profits and through peer-reviewed academic journals. The definition of underserved should be as broad as possible to allow for a more inclusive banking system which provides access to the largest possible group of Americans, in particular it should serve all Americans who do may not have access to more traditional consumer financial services.

Finally I would like to voice my support for proposed rule changes D2 and D3. These rule changes which would allow for the inclusion of Select Employee Group Contractors in a Multiple Common Bond credit union and the inclusion of Office/Industrial Park Tenants in a Multiple Common Bond credit union. These are changes that would directly impact my branch.

My branch is located in an office park in south eastern Pennsylvania and under the proposed rule change all of the tenants of the office park would qualify for membership. My branch has built a relationship with the leasing and development company that owns the office park and they are interested in providing credit union membership to all of their tenants. When this branch was opened we asked regulators about this possibility as the leasing company had requested it, but it was not possible.

Submitter Info.txt

This regulation creates some difficulty in qualifying members that I feel is unnecessary. The majority of employees on the campus qualify for credit union membership by living or worshipping within the underserved area that my credit union serves, but we have to qualify each employee individually. This proposed rule change would allow us to work more directly with the leasing company on the corporate campus to promote credit union membership and would make marketing efforts easier. This is especially true for potential members who would already qualify for membership under the current rules. Please consider the cases and examples that I have presented when deciding on the current rule change.

First, I would like to voice my support for section C.1 of this proposed rule change. "Exclusion of Non-Depository Institutions and Non-Community Credit Unions from Concentration of Facilities Ratio." As noted in the proposed rule change, the inclusion of non-community credit unions would distort the calculations of NCUA to determine what areas can be considered underserved by multiple common bond credit unions. I would also like to voice my support for the second component of this proposed rule change. That is, data reflecting the presence of non-depository institutions, such as trust companies, which do not accept deposits from the general public.

These two types of institutions are not in fact open to accepting business from the general population and their inclusion in the concentration of facilities ratio leads to a decline in service in underserved communities. I am also in support of excluding these two types of institutions as part of a recalculation of the ratio in the event that the initial facilities ratio fails to identify a proposed area. I support the way that this method conserves the resources of the NCUA.

Under section C.2 I would like to voice my support for proposed rule change, "Alternatives to Identify Areas Underserved by Other Depository Institutions." I support alternatives to the ratio of facilities calculation, including the creation of "underserved counties" and the proposed rule change permitting credit unions to create their own metrics and submitting them as evidence of underservice in a proposed area.

As invited by the board in the proposed rule change I would like to submit some other ideas for methodologies that could be used to measure whether or not an area is underserved. The proposed change includes metrics such as data from the Community Reinvestment Act, data from the Office of the Comptroller of the Currency, and the Board of Governors of the Federal Reserve System. These would all be great sources of data that credit unions should be able to use to claim that they are in an underserved area.

I would like to include data such as percentages of students of receive free and reduced lunch, immigration statistics, or information about banking habits collected by non-profits and through peer-reviewed academic journals. The definition of underserved should be as broad as possible to allow for a more inclusive banking system which provides access to the largest possible group of Americans, in particular it should serve all Americans who do may not have access to more traditional consumer financial services.

Finally I would like to voice my support for proposed rule changes D2 and D3. These rule changes which would allow for the inclusion of Select Employee Group Contractors in a Multiple Common Bond credit union and the inclusion of Office/Industrial Park Tenants in a Multiple Common Bond credit union. These are changes that would directly impact my branch.

My branch is located in an office park in south eastern Pennsylvania and under the proposed rule change all of the tenants of the office park would qualify for membership. My branch has built a relationship with the leasing and development company that owns the office park and they are interested in providing credit union membership to all of their tenants. When this branch was opened we asked regulators about this possibility as the leasing company had requested it, but it was not possible.

This regulation creates some difficulty in qualifying members that I feel is unnecessary. The majority of employees on the campus qualify for credit union membership by living or worshipping within the underserved area that my credit union

Submitter Info.txt

serves, but we have to qualify each employee individually. This proposed rule change would allow us to work more directly with the leasing company on the corporate campus to promote credit union membership and would make marketing efforts easier. This is especially true for potential members who would already qualify for membership under the current rules. Please consider the cases and examples that I have presented when deciding on the current rule change.