

**VIA EMAIL**

January 28, 2016

Mr. Gerard Poliquin  
Secretary of the Board  
NCUA  
1775 Duke Street  
Alexandria, Virginia 22314-3428

**RE:** Proposed Regulations – Chartering and Field of Membership

Dear Mr. Poliquin,

As an employee and member of a credit union, I'd like to thank you for allowing me the opportunity as well as other credit union employees and members the ability to provide feedback and commentary on the proposed changes to the Chartering and Field of Membership Manual regulations.

I joined DCU (Digital Federal Credit Union) as a member in 2004 and became the credit union's Public Relations Manager in 2008 and most recently was appointed the Marketing Manager in 2015. It was through my original employer that I had the ability to become a member and it was the best decision I made when it came to managing my finances. It's because of select employee groups that I and other members have the benefit of being able to join a credit union and I welcome the fact that the NCUA is looking to update the Chartering and Field of Membership Manual.

Overall, all of the proposed changes should be applauded as they will benefit consumers, further the ability for credit unions to continue to serve new members in need of financial services, and enhance the financial well-being of those new members. Of the proposed changes, I would like to offer my comments on the following:

"Reasonable Proximity" through Online Access to Services: Technology is at the forefront of how many Americans conduct business today, including many members of DCU. From online banking to apps that allow a member to never have to set foot in a branch, credit unions should be allowed the opportunity to serve members who choose this avenue. By amending the definition of "Service Facility" to extend it to include online internet channels, this change would ensure that credit unions are able to serve members who opt for technology.

"Underserved" Areas: Although the economy continues to improve, there are unfortunately those areas throughout the country that need the type of assistance and services that a not-for profit financial institution such as a credit union can provide. Revisions as to how the NCUA determines whether or not an area qualifies as being "underserved" should take into consideration the following economic factors when doing so: the unemployment and poverty rate, number of foreclosed properties in a community, and the average income of residents living in particular area. These factors are truly a determining factor of how prosperous or in-need a community is.

Again, thank you for the opportunity to provide feedback, comment, and have an open dialogue on the proposed regulation changes.

Most Sincerely,

John LaHair  
Marketing Manager and member of DCU - Digital Federal Credit Union since 2004