

February 01, 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,

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 LBS Financial Credit Union, which serves school districts in Long Beach, California and members living in adjacent southern California counties. We are a California state chartered credit union with \$ 1.2 billion in total assets serving 122,000 members. I am writing to express our support for NCUA's proposed field of membership rule.

Even though we are a state chartered credit union, we believe the NCUA proposed field of membership changes will enhance the dual charter system. It will help to strengthen the federal charter especially when compared to the state charter in California. Any improvements to the federal charter are important and helps to create incentive for our state regulator to stay competitive with its own field of membership guidelines as well. A true win-win for both state and federally chartered credit unions.

This will help all credit unions to remain innovative, competitive, relevant, and financially healthy by allowing them to grow their membership and bring vital financial services to more Americans. Americans need a choice in the consumer financial services marketplace and a true alternative to the for profit banking industry and credit unions are the best answer. This new field of membership proposal allows federally chartered credit unions to have a better opportunity to serve more members and make a positive difference in their financial lives.

Since California is such a heavy populated state I think that NCUA should consider increasing or removing its population limit of 2.5 million for the use of Combined Statistical Areas (CSA) and Core Based Statistical Areas (CBSA).

I appreciate the opportunity to comment on this proposed rule and thank you for considering our thoughts on Field of Membership. These proposed changes will truly strengthen the dual charter system and bring more financial services to American consumers. Therefore, we urge NCUA to approve a final rule soon so that credit unions can begin to take advantage of this much needed regulatory relief and field of membership flexibility as contained in the proposed rule.

Sincerely,

Jeff Napper  
President/CEO  
LBS Financial CU

cc: CUNA, CCUL