



February 8, 2016

Mr. Gerard Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, VA 22314

Re: Comments on Notice of Proposed Rulemaking Regarding Chartering and Field of Membership –  
RIN 3133–AE31

Dear Mr. Poliquin,

On behalf of the Alaska Credit Union League and our 12 Credit Unions, I would like to thank the National Credit Union Administration for its efforts to modernize the Field of Membership rules under which we operate and attempt to thrive.

The proposed regulation put forth by your Agency is a strong first step to ameliorate the limitations placed upon all FCU's when it comes to serving our communities. Additionally, our competitive landscape is rapidly shifting. Aside from the traditional banking industry, we are competing with everyone from Walmart to State Farm, with a whole host of internet businesses added in for good measure. In order for our industry to stay strong and vibrant, we need more strategic flexibility.

We support the changes you have proposed, and offer a few thoughts about certain key points.

We encourage you to remove FOM limitations that are not mandated by the Federal Credit Union Act, such as the core requirement for serving a Community Based Statistical Area and the Population limit of 2.5 Million people. The FCUA contains numerous strategic limitations on Credit Unions, and we do not believe that the NCUA should create more.

Additionally, we appreciate that the proposed changes include a bit of a return to the former narrative approach in the inclusion of Adjacent Areas to Well Defined Local Community (WDLC), but would like to see more of a return to the prior narrative standard. Our State is vast and unique, and

as a result our definition of community doesn't fall within typical definitions, and our commerce is different from most other places in the country. The narrative approach would provide us with an avenue to potentially capture what is unique about our State, and therefore we would like to see it returned in full.

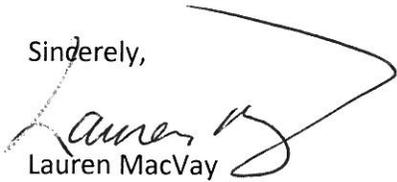
We also support the proposed change to the calculation of the Concentration of Facilities Ratio which would now not include non-depository institutions and non-community credit unions, as this is a more realistic reflection of the need for a credit union presence in a community. Additionally, the expansion of the definition of "service facility" to include electronic services is a change that reflects the modern reality of how consumers interact with financial services, and is a highly appropriate improvement to the current regulatory environment. However, this definition should also be used in meeting the service facility requirement for underserved areas. Alaska's unique geography requires creative solutions that might not always fit within the standard definition of a service facility. More flexibility within that definition for underserved communities would make room for solutions that reflect the realities of servicing our remote communities.

Additionally, we encourage you to not only enact the proposed changes to speed addition of employment groups between 3,000 and 5,000, but to increase that number to 10,000. Given the current regulatory burdens facing credit unions and the increased costs of offering competitive services, the likelihood that a credit union could be formed and thrive on a population of 5,000 potential members is slim. A potential group of 10,000 would have a much more viable chance to build enough base to truly meet their new members needs.

We are appreciative of the efforts you have made to offer regulatory relief and allow us more flexibility with Chartering and Field of Membership options. We encourage you to move forward with the changes you have proposed, but consider making certain enhancements as noted above.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Lauren MacVay", is written over a large, stylized, hand-drawn arrow pointing to the right. The signature is written in a cursive, somewhat informal style.

Lauren MacVay

Chair, Alaska Credit Union League