

February 08, 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 Community Plus Federal Credit Union, which serves three rural Illinois counties to express support for NCUA's proposed field of membership rule.

The Core Area Service Requirement would allow a community chartered credit union to serve a portion of a CBSA. This would be useful in rural areas where it may not be practical to serve an entire CBSA. A second provision in the proposed changes would allow for technology to be utilized for delivering services to a group and thereby meet the requirements for "reasonable proximity. We also support allowing a congressional district to be used as a well-defined local community. While this is not an issue in Illinois, it would have tremendous value to other community credit unions serving sparsely populated states in the western states.

The greatest impact for our credit union is allowing greater use of technology for demonstrating reasonable proximity to the group. This will support our business case for investing in technology to serve our members.

Our credit union supports all components of the proposed regulation, but finds special merit in the proposals to allow use of technology to meet the requirements of reasonable proximity.

Thank you for the opportunity to comment on this proposed rule and for considering our views on Field of Membership. We urge the agency to approve a final rule soon so that credit unions can take advantage of the regulatory relief and field of membership flexibility in the proposed rule.

Sincerely,

Michael Daugherty
President
Community Plus FCU

cc: CUNA, CCUL