

February 05, 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 Houston Highway Credit Union, which serves The Greater Heights Area of Houston, to express support for NCUA's proposed field of membership rule.

Houston Highway is a state chartered credit union that strongly supports the updated Field of Membership rules for Federal chartered credit unions. As credit unions, this is a win for our members and potential members as flexibility is increased for federally insured participants who share a common bond.

As these changes are meant for federal credit unions, we still show support for any outdated means of what field of membership means. An update to FOM, regardless of charter, is a win for credit unions. As state credit unions have a bit more flexibility already, we do want to see the same for our federally insured counterparts.

Houston Highway shows support for the proposed change to the Core Area Service Requirement. Eliminating the requirement to serve a "core" area will allow the community chartered credit unions to serve a variety of areas that may not consist of a core area. Stretching beyond the boundaries of a single county to include that which may not have met the core requirements provides the greater flexibility to meet all districts.

The increase in rural district population limits from 250,000 to 1 million drastically increases the amount of members that can be potentially served. On the topic of population, the current combined statistical areas are capped at 2.5 million, with designation for more to those who apply and are designated approval by the Office of Management and Budget. So this won't affect smaller, well-defined areas, but could provide issues for those over 2.5 million. Maybe we should look at raising the cap to meet the largest political jurisdiction that the NCUA has approved; 10 million. We also support the use of Congressional districts as a well-defined local community.

We support the inclusion of office and industry park tenants. This allows freedom of choice when adding SEGs to a field of membership as long as the business does not have over 3,000 employees, in which NCUA demands that the business provide

reason why they can't form a stand-alone credit union.

Houston Highway commends NCUA for continuing to modernize America's credit unions. Thank you for the opportunity to comment on this proposed rule and for considering our views on Field of Membership. We hope that our letter will show support for all federal and state chartered credit unions and 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,

Joey Waddell
MSR
Houston Highway CU

cc: CUNA, CCUL