

From: [Carol Brown](#)
To: [Regulatory Comments](#)
Subject: Comments on Notice of Proposed Rule – Chartering and Field of Membership
Date: Friday, February 05, 2016 2:35:34 PM
Attachments: [image001.png](#)

Carol Brown
Vice President, Marketing / Business Development
Black Hills Federal Credit Union
2700 N Plaza Drive
Rapid City, SD 57702

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke St
Alexandria, VA 22314-3428

Subject: Comments on Proposed Rule, Part 701 – Chartering and Field of Membership

Dear Secretary Poliquin:

Thank you for the opportunity to submit comments regarding the NCUA Board's proposed changes to the Chartering and Field of Membership Rules. As a manager at Black Hills FCU for more than 20 years, I appreciate the careful consideration that went in to developing the proposed changes.

The new rules expand the population limit placed on Rural Districts to 1 million people and will provide credit unions with the opportunity to expand based on need, opportunity and logic, rather than placing undo concern on expanding within the cap of 250,000. The current cap limits our ability to serve the most underserved and economically challenged areas of South Dakota. While the NCUA may not realize the unintended consequences of the low population cap, in our state, with 9 reservations and many low-income areas, it can appear we have no interest in helping the people who most need credit union services. This is not the case as witnessed by our commitment to reach out to the Lakota Nation through our advertising and advocacy to help people work toward financial independence.

Late in 2012, we chose to merge with Cheyenne River Community First Federal Credit Union which encompasses two large counties in the middle of South Dakota. Since merging, we have nearly doubled our membership, provided lending opportunities that dramatically increased loan volume (from \$420,197 to \$3,181,547) and created a culture of trust that encourages our members to save, some for the first time, which quadrupled shares from \$522,563 to \$2,126,923. The increased population cap will allow us to replicate our success in other low-income areas.

The proposed reform on expansion, specifically the NCUA Board's proposed rule recognizing an individual Congressional District as a well-defined, local community, is much needed in rural states like South Dakota. We are one single Congressional District, represented by two senators and one representative in Congress working for the good of all 855,000 citizens. This proposed rule will afford us the opportunity to serve our entire state as one political jurisdiction, and give all South Dakotans access to credit union services.

Being convenient, local, and reachable to members and future members is a priority for BHFCU. We are a wide-spread community with limited, local-financial resources, especially in rural communities. We encourage NCUA to approve the proposed rules and allow all South Dakota citizens access to member-owned, not-for-profit, financial services.

Sincerely,

Carol Brown



Carol Brown
VP Marketing and Business Development
Black Hills Federal Credit Union

Our Mission: We improve lives.