

**From:** [Brad D. Bullock](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Brad Bullock Comments on Notice of Proposed Rulemaking Regarding Associational Common Bond  
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Gerard Poliquin  
National Credit Union Administration  
Alexandria DC 22314

Brad Bullock Comments on Notice of Proposed Rulemaking Regarding Associational  
Common Bond

Dear Gerard Poliquin:

My name is Brad Bullock and I have spent the last seventeen years working in community banks in New Mexico and Texas.

Dear Mr. Poliquin:

My parents were both public educators and my first accounts as a child were held at a teachers' credit union in Roswell, New Mexico. I have no issue whatsoever with credit unions serving specific needs and specific populations. However, as the industry attempts to expand that mission, it does concern me that a community bank cannot compete on an even playing field.

My bank serves customers and the surrounding community, and unfair competition from the credit union industry impacts my business. My community bank, and many others in the area, have substantially withdrawn our efforts to meet the credit needs of individuals in our communities because we cannot compete with rates and terms offered by credit unions. Banks are not tax exempt, but are for-profit businesses attempting to balance offering products and services to best serve customers while growing the business to offer more lines of credit and other economic capital to communities. Up to this point, many community banks have made the decision to primarily pursue commercial lending since the consumer lending area is dominated by credit unions.

As a banker, I am concerned about the impact of further expanding the credit union industry's potential field of membership through the proposed rule on Chartering and Field of Membership. The provisions of this proposal, when implemented all together, would provide federal credit unions with the opportunity to increase membership drastically, resulting in a broad expansion of the credit union industry's tax subsidy.

Congress deliberately instructed NCUA through the FCU Act to keep credit unions small and focused on providing services to specific groups that lack other access to financial services. The proposal would disregard this Congressional directive by modifying NCUA's process for assessing stand-alone feasibility of groups that seek to be added to the field of membership of an existing multiple common bond credit union by allowing a streamlined determination for groups with between 3,000 and 4,999 potential new members.

I appreciate in advance your further consideration of this matter.

Sincerely,  
Brad D Bullock  
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Midland, TX 79701