

From: [Chris Burgess](#)
To: [Regulatory Comments](#)
Cc: [Meredith, Ronald R](#)
Subject: Comments on the proposed new regulations on "Field of Membership."
Date: Friday, February 05, 2016 3:45:50 PM
Attachments: [image002.png](#)
[NCUA Charter Reply.pdf](#)

Gerard Poliquin, Secretary of the Board
National Credit Union Administration
1775 Duke Street,
Alexandria, Virginia 22314-3428

Mr. Poliquin:

Thank you for the opportunity to comment on the proposed new regulations on "Field of Membership." Unquestionably my credit union and I support NCUA's efforts to make improvements to the regulations governing FOM.

There is, however, one important area where we would request an additional change. My credit union, Baylands Federal Credit Union, was given a community charter in 2002, prior to the establishment of the current MSAs in our area. Currently, our FOM exists within two distinct MSAs. NCUA has notified us in writing that in order to make a minor expansion of our community in one of the MSAs, we will have to give up the counties that exist in the other MSA.

As I read the proposed regulation, I cannot find where we would be helped in expanding our charter. Please consider finding a way to relieve the problem of a credit union expanding if it already exists in two MSAs. It seems that when a credit union is permitted to expand significantly, crossing state lines into another State as was allowed in Charlotte, NC recently, then Baylands ought to be able to add a tiny expansion within one of the MSAs in which we already exist. I have attached the letter from NCUA that we received in August 2015. I believe this letter will greatly clarify our issue. Expansion and growth are crucial for us to survive in the long term as we carry the ever increasing regulatory burden. All we need is a little help.

Thank you for your consideration of this matter. I am almost constantly available if you should have any questions or require any clarifications.

Sincerely



Christopher R. Burgess

President & CEO
Baylands Federal Credit Union
2004 Main St. (P. O. Box 392)
West Point, Virginia 23181
(804) 843-2520 Ext. 138
(804) 916-0760 cell