

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 Houston Highway Credit Union (HHCU) which serves those who live, work, worship, or attend school in The Greater Heights Area of Houston, and its surrounding community. We are a state chartered, community credit union with \$62 million in assets serving 5,800 Members. I am writing to express our support for NCUA's proposed field of membership rule.

HHCU applauds NCUA for recognizing the outdated field of membership (FOM) requirements when compared to some of the innovative state chartered credit unions. HHCU is a state charter, but we are committed to the idea of a dual chartered system. This system allows incentive for NCUA and state regulators to move policies in a direction that emits a broader path for operating authority and impose fewer ridiculous constraints on operations.

We highlight support for the following...

- Eliminating the Core Area requirement currently imposed and allowing credit unions to serve a portion of that Core Based Statistical Area (CBSA) and grow appropriately with its ability to serve.
- Allowing the appropriated CBSA to be considered a well-defined portion regardless if the population of the encompassing area exceeds 2.5 million.
- The new use of Combines Statistical Area which is included in the definition of well-defined local community (WDLC).
- Granting adjacent areas to what is already considered a CBSA allowing credit unions to serve contiguous areas within a WDLC.
- Addition of congressional districts to be used as WDLC.
- Reasonable Proximity through Members' Online Access to Services. This is showcasing the potential, through technology, for credit unions to expand its service and still be including as a "Service Facility."
- Inclusion of Select Employee Group (SEG) Contractors in a Multiple Common Inclusion of Office or Industrial Park Tenants in Multiple Common Bond. This allows a multitude of credit unions that share a common bond to include these SEGs within its FOM. As long as these SEGs are less than 3,000 employees. If in between 3,000-5,000 they must provide reason why they can't charter a credit union.

Thank you for the opportunity to comment on this proposed rule and for considering Houston Highways view 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,

Austin McCafferty  
Special Projects and Research Manager  
Houston Highway CU

cc: CUNA, CCUL