

From: [Hartman, Hattie L](#)
To: [Regulatory Comments](#)
Subject: Leah Hartman comments on notice of proposed rule making regarding associational common bond
Date: Monday, February 08, 2016 5:01:00 PM

February 8, 2016

Dear Mr. Poliquin:

I am a banker that serves several small communities and I am very concerned about the NCUA's proposed rule on Chartering and Field of Membership. The proposed rule would threaten the future of small community banks.

I want to stress the fact that credit unions have been given many privileges by Congress, but those privileges were given to credit unions with limitations. Members were to share a common bond, or a local proximity. The proposed rule completely disregards these privileges. This proposed rule goes against everything Congress intended when the FCU Act was amended in 1998. The term "local" was included in the FCU Act to limit the membership by proximity. The proposed rule redefines "local" to include an individual Congressional District. This is completely unreasonable. Congress never intended "local" to encompass an entire Congressional district. The proposed rule goes against the very intent of Congress.

The proposed rule threatens the future of Community State Bank and other small community banks like ours. The NCUA should focus on implementing and enforcing credit union laws as they are written. If credit unions want to eliminate the common bond requirement and operate like banks, they should be taxed in the same manner and be required to meet the same set of regulatory standards.

Community Banks are a vital part of small communities. If Credit Unions are granted the right to operate in the same manner as banks, without having to pay taxes, small rural banks will be unable to compete. Communities will be harmed when an individual can no longer cash a check, make a deposit, or speak with a loan officer in the town in which they live. Recently, in Dover, Oklahoma, the local high school burned to the ground. Community State Bank has been a part of the rebuilding process by donating money, helping to raise money, and offering community support. Small banks are important, and the proposed rule would be detrimental to our bank and others like us.

The proposed rule is completely unreasonable. If Credit Unions no longer have to share a common bond or operate within a small geographical area, then they should be treated as a bank.

Sincerely,

Hattie Leah Hartman J.D.

Community State Bank
Hennessey, OK