

From: [Ronald A. Gottschalk](#)
To: [Regulatory Comments](#)
Cc: [Ronald A. Gottschalk](#)
Subject: FOM Proposal 2016
Date: Monday, February 08, 2016 1:03:27 PM

Dear NCUA,

Clearview FCU (Community CU), located in Moon Township, PA would like to comment on the new FOM proposal. We would like to see the proposal be enhanced a little further in regards to acquired membership from mergers. For example, we serve 10 counties in SWPA that borders up to the Ohio state line, and these counties are all tied to the city of Pittsburgh. We merged in a credit union 2 years ago that has an office in E Liverpool, Ohio and we currently can't grow this office because it is not in our 10 county FOM. According to NCUA, this office is in a different county beyond the state line and they feel it is not tied to Pittsburgh. To the contrary, most of the people in this county have ties to Pittsburgh as this is the closest metropolitan area to them. We have a business and marketing plan that can be directed for this area to help our members and potential members. Even with this proposed rule, NCUA feels that we cannot be approved to service this county (Columbiana, OH) and area. I know the population limit is also a factor, so this could decrease the chances of approval.

We are in favor of the other changes in the rule, but would hope it would go a little further to speak to our situation above. There is currently much consolidation in the credit union industry with much more to come. There is going to be a lot of situations like the one I have described because of credit union mergers. At the least, can credit unions be approved to serve communities in which a merger took place and is not in the current FOM. Strong credit unions might be more willing to merge in a struggling credit union knowing that the community could be served even if it is outside the FOM for the stronger credit union.

These are a few thoughts we have on the FOM proposal.
We appreciate your time and efforts with this proposed rule.

Thank you,
Ron Gottschalk

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