

From: [Douglas Allman](#)
To: [Regulatory Comments](#)
Subject: Comments on Proposed Rule: 12 CFR Part 701, Chartering and Field of Membership Manual
Date: Monday, February 08, 2016 6:00:58 PM

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428
regcomments@ncua.gov

Dear Mr. Poliquin:

Thank you for considering comments from NASA Federal Credit Union on the National Credit Union Administration's ("NCUA") recent proposed rule, [12 CFR Part 701](#), Chartering and Field of Membership Manual. We appreciate the opportunity to express our support and provide recommendations.

We are a Multiple Common Bond credit union representing 120,000 members. We commend and are supportive of the NCUA's proposed rules with particular support for:

1. Inclusion of Select Employee Group (SEG) Contractors in a Multiple Common Bond - Would allow the ability to add persons who work regularly for an entity that is under contract to any of the multiple SEG sponsors listed in our charter, provided there is a "strong dependency relationship."

Recommendation: We support the ability to add contractors of a multiple SEG sponsor. We feel allowing for greater flexibility in serving those members closely associated with a SEG will be beneficial to credit unions. However, we suggest flexibility be given for the interpretation of a "strong dependency relationship."

2. Reasonable Proximity through Members' Online Access to Services – Would allow for modern technology to be utilized in determining whether "Service Facility" is present for purposes of demonstrating reasonable proximity to a group.

Recommendation: We support the expansion of the definition of "Service Facility" to demonstrate reasonable proximity to a group and recognize the role of advancing technologies in enabling reasonable proximity between the groups it serves.

The positive rule changes put forth by the NCUA will give credit unions the ability to more fully operate and compete and serve member-owners in a safe and sound manner and provide competitive products and services.

We are supportive of the NCUA's proposed rules on FOM and we hope our comments will be respectfully reviewed and considered as the final rules are formulated in the near future. Thank you for the opportunity to comment on the Proposed Rule.

Sincerely,

Douglas M. Allman, CEO