

From: [Allen Zandstra](#)
To: [Regulatory Comments](#)
Subject: Comments on Proposed Rule, Part 701--Chartering & Field of Membership
Date: Sunday, February 07, 2016 11:58:26 AM

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Gerard Poliquin, Secretary of the Board
1775 Duke Street
Alexandria, VA 22314-3428

Subject: Comments on Proposed Rule, Part 701 – Chartering and Field of Membership

Dear Secretary Poliquin:

As a Director on Black Hills Federal Credit Union’s Board of Directors, I know modernization of FOM rules is critical to the future growth and prosperity of credit unions. I support the proposed Field of Membership (FOM) rule.

While past regulations have severely limited rural credit unions like Black Hills FCU, the proposed rule to recognize an individual congressional district as a well-defined local community will ensure more South Dakotans have access to credit unions. This is extremely important to consumers in rural and underserved areas who will benefit from access to the free and low-cost products and services found at credit unions.

For the same reasons, the ability to serve our neighboring states (the multi-state expansion limit) gives more people in rural areas a choice in financial institutions.

I also support increasing the rural district population limit to 1,000,000. This will allow credit unions in South Dakota and other rural areas to serve more members, while maintaining long-term stability for our member-owners.

Thank you for considering this proposed rule that clearly benefits credit unions, but more importantly, benefits the people that will now have access to premier financial services. I urge you to proceed with the proposed Field of Membership rule.

Respectfully,
Allen Zandstra
Director, Board of Directors
Black Hills Federal Credit Union