

**From:** [Chandler Hallmark](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Comments on Proposed Rule, Appendix B of Part 701  
**Date:** Tuesday, January 26, 2016 3:50:05 PM

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Dear Secretary of Board Poliquin,

I am writing on behalf of America's First Federal Credit Union regarding the National Credit Union Administration's (NCUA) proposed rule amending the Chartering and Field of Membership (FOM) Manual, incorporated as Appendix B of part 701. Thank you for considering proposals that would help consumers have more affordable options concerning their finances. Bringing the FOM regulations up to date and reviewing any restrictions now placed on credit unions that were not intended with the Federal Credit Union Act will help both consumers and credit unions.

America's First Federal Credit Union is a community chartered credit union serving the Birmingham Metro Area with a population of about 1.2 million. We are mainly concerned with the proposal that would permit the addition of adjacent areas to a community consisting of a Single Political Jurisdiction, CBSA, CSA. There are 2 counties adjacent to our approved community charter where we could offer consumers another choice in affordable financial services. We have branch locations established in both of these counties but are very limited on who may join because of the current interpretation of the Federal Credit Union Act and FOM regulations.

Community Chartered credit unions are unjustly limited on their ability to grow under the current FOM regulations. Our community chartered service area is well below the 2.5 million population limit. Since we are in a relatively small metropolitan statistical area compared to the population cap and we already have the resources to serve potential new members in the two desired counties, America's First can continue to grow and serve a portion of the population that is currently limited on their affordable financial choices. Consideration of this update to the FOM regulations will help in both of these circumstances. The important aspect of this FOM regulation update is to allow America's First, and other credit unions in our situation, to add these 2 adjacent counties without having to discontinue service to our currently approved Community Charter.

We are grateful for the NCUA's work and consideration in amending the Chartering and FOM Manual to assist credit unions in providing affordable financial choices for all consumers. It can be very frustrating to have a potential member, who has taken the time to research an affordable option for them, walk in your door seeking financial services only to have to deny them service because of the current FOM regulations. The NCUA's work on amending the regulations will provide much-needed relief for the entire credit union industry as well as provide more affordable financial choices for the consumer.

Thank you for the opportunity to share my comments concerning this important issue,

Sincerely,

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