



IBEW 26
Federal Credit Union

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Not For Profit Not For Charity But For Service



February 8, 2016

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

Re: Comments on Proposed Rule: 12 CFR Part 701, Chartering and Field of Membership Manual

Dear Mr. Poliquin:

Thank for your consideration regarding our formal comments from IBEW 26 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.

Our credit union represents 3077 members. We commend and are supportive of the NCUA's proposed rules but would like to focus in on several areas of particular concern.

1. Inclusion of Select Employee Group (SEG) Contractors in a Multiple Common Bond and Inclusion of Office or Industrial Park Tenants in A Multiple Common Bond - Would allow multiple common bond credit unions to include as a Select Employee Group the employees of a park's tenants in the FOM within certain limitations.

Recommendation: We strongly support the ability to add contractors of a multiple SEG sponsor and employees of an office or industrial building as a separate SEG. We feel allowing for greater flexibility in serving those members closely associated with a SEG will be beneficial to credit unions.

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.

3. Trade, Industry or Profession (TIP) As a Single Common Bond - Expands the definition of a TIP charter to include employees of entities that have a strong dependency relationship with (and whose employees work directly with employees of) other entities within the same industry.

Recommendation: We strongly support this provision, allowing a number of TIP charters to serve vendors, contractors, or other groups closely associated with a particular Trade or Industry.

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 fully 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,

Doreen Cleland

Doreen Cleland, CEO

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