

From: [James Boyd](#)
To: [Regulatory Comments](#)
Cc: syashewski@cornerstoneleague.coop
Subject: Comments on Notice of Proposed Rulemaking Regarding Associational Common Bond
Date: Monday, February 08, 2016 1:57:14 PM

Dear Gerard Poliquin, Secretary of the Board, National Credit Union Administration:

Abilene Teachers Federal Credit Union is a \$413 million credit union serving 42,000 members from its offices in Abilene, Texas. Thank you for the opportunity to respond to this proposed rule.

NCUA's current FOM regulation for community credit unions requires that credit unions that wish to serve a community consisting of a Core Based Statistical Area (CBSA) must serve what NCUA defines as the "core area" of the CBSA. NCUA defines the core area as the most populous county or named municipality in the CBSA's title. Serving a CBSA or "core area" is not required by the Federal Credit Union Act (FCUA). NCUA should not place limitations on service areas in a statistical area, because these limitations or requirements can divide these areas into portions that do not represent a viable community or can exclude the viable portions of a community. The FCUA contains real limitations on who credit unions can serve, the NCUA should not impose an additional layer on credit unions.

The current FOM regulation does not allow a community chartered credit union to serve a portion of a CBSA if the overall population of the CBSA exceeds 2.5 million. The 2.5 million limit is not required by the Federal Credit Union Act. And a credit union is required to serve the "core area" of the CBSA, but the 2.5 million cap kicks in here as well.

The narrative approach should be used to allow credit unions to describe why specific NCUA requirements for any method to determine a community have not completely captured a community. The narrative approach should also be allowed in the case that a credit union does not fit any of the criteria above but has a compelling reason that an expanded field of membership is within its community.

This proposal increases the current limit of the population that rural district charters can serve from 250,000 to 1 million. Why is this population limit so low? Some credit unions are capped at 2.5 million, but NCUA discriminates against rural credit unions with an even lower arbitrary cap?

So many comments have been tossed around in "Credit Union Land" concerning the need for credit unions to send in a massive amount of comment letters to offset those that you have received from the banks. Has NCUA started raiding funds from the bankers now? I thought your power only extended to credit union deposits and our members (oh, and CUSO's now too, almost forgot that one)? If the banks think they are short changed by credit unions then let them convert to a credit union. When was the last time that happened?

Sincerely,

James Boyd
President/CEO

James Boyd
President / CEO



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