



James D. "Dan" Rollins III
Chief Executive Officer

February 5, 2016

Gerard S. Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Dear Secretary Poliquin,

As a community banker, I am concerned about the impact of further expanding the credit union industry's potential field of membership through the proposed rule on Chartering and Field of Membership. The National Credit Union Administration (NCUA) proposal will remove the requirements that limit membership to "persons or organizations within a well-defined local community neighborhood or rural district" as outlined in the Federal Credit Union Act (FCUA).

Congress deliberately instructed the NCUA through the FCUA to keep credit unions small and focused on providing services to specific groups that lack other access to financial services. In fact, when Congress amended the FCUA in 1998, it intentionally inserted the term "local" as a means of limiting the geographic scope of community chartered credit unions. Combined with the terms "well-defined", it is clear Congress intends to impose finite and narrow limits on the area that a community credit union may serve. The provisions of this proposal, when implemented all together, will provide federal credit unions with the opportunity to drastically increase membership.

On the Mississippi Gulf Coast, my company already competes with Kessler Federal Credit Union, a \$2.2 billion credit union that is larger than 94% of all banks in our state. To allow credit unions to expand their membership beyond congressional intentions will impact our ability to serve our customers and our communities.

I strongly urge the NCUA to maintain the current rules on Chartering and Field of Membership.

Respectfully,

James D. Rollins III
Chief Executive Officer

cc: U. S. Senator Thad Cochran
Dirksen Senate Office Building SD 113
Washington, DC 20510-2402

U. S. Senator Roger F. Wicker
555 Dirksen Senate Office Building
Washington, DC 20510