

February 08, 2016

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

RE: Comments on Notice of Proposed Rulemaking for Field of Membership - RIN: 3133-AE31

Dear Gerald Poliquin,

Introductory paragraph:

The National Credit Union Administration Board (NCUA) is proposing to amend part 701 of its rules and regulations to make revisions to the agency's chartering and field of membership manual. I am writing on behalf of Fresno County Federal Credit Union, which serves over 325 SEGs to express support for NCUA's proposed field of membership rule.

The proposed changes, should they be implemented, would enable more consumers to take advantage of the cost effective services provided by credit unions. At Fresno County Federal Credit Union, we proudly live by five Core Values, one of which is to improve the financial strength of our members. It is our responsibility as credit unions to help members be financially better off and having greater access to credit union eligibility is one step that needs to be taken.

Numerous elements of the proposed ruling will greatly impact Fresno County Federal Credit Union's ability to serve the population of the Central Valley more. The elements of the proposed ruling that would benefit the Central Valley the greatest are the "Reasonable Proximity through Members' Online Access to Services, the Inclusion of Select Employee Group Contractors and Inclusion of Office or Industrial Park Tenants in Multiple Common Bond, and the Streamlined Determination of Stand-Alone Feasibility of Groups Greater than 3,000." The Central Valley is geographically large, making it difficult in the past for us to add SEGs who are not within the current geographic restrictions. Often their employees drive by one of our branches, but because the branch and their main office is out of the current requirements, we are unable to add them as a SEG. In addition, we have often had membership requests of employees of contractors of some of our largest SEGs (County of Fresno, County of Madera, Community Regional Medical Center, etc). We have had to deny membership even though they feel as if they are working for one of these SEGs. Lastly, the Credit Union has had opportunities to add SEGs larger than 3,000, but the process is daunting. In our experience, none of the larger SEGs we have partnered with have ever examined the opportunity to develop their own credit union, which is why they wanted to partner with us. However, the process is very tedious and time consuming. We very much support raising the number to 5,000 or even higher.

Thank you for the opportunity to comment on this proposed rule and for considering our views on Field of Membership. We urge the agency to approve a final rule soon so that credit unions can take advantage of the regulatory relief and field of membership flexibility in the proposed rule.

Sincerely,

Keri Bennitt  
VP-Marketing/Membership  
Fresno County FCU

cc: CUNA, CCUL

---