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February 2, 2016

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

Dear Mr. Poliquin:

On behalf of Army Aviation Center Federal Credit Union (AACFCU), I am writing to you regarding the National Credit Union Administration's (NCUA) proposed rule amending the Chartering and Field of Membership (FOM) Manual, incorporated as Appendix B to part 701. I appreciate NCUA's initiative in this rulemaking to provide meaningful regulatory relief to credit unions and welcome the opportunity to provide comments on this proposal. The credit union industry has long advocated for FOM reform, and we appreciate the NCUA Board's support for modernizing the agency's FOM regulations for the first time in fifteen years.

NAFCU continues to hear from our members that NCUA's FOM Rule and Regulations unnecessarily inhibit their ability to serve their communities and other consumers who want and need affordable financial services. While we acknowledge that legislation is necessary to resolve certain limitations of FOM rules, we support NCUA's attempt at regulatory relief by streamlining its chartering and FOM procedures, as well as removing many non-statutory constraints on FOM chartering and expansion.

Recently AACFCU applied for a new FOM in underserved Covington County, AL. This was an area where the Credit Union already had over 1,100 members who used other AACFCU branches that were over 30 miles away. There were 8 facilities tests requested before we could get four tracks close to the area where a building was being purchased and renovated. The instructions for applying for a new field of membership were followed and the information was submitted. After the first look, NCUA returned a three-page list of items that had to be completed before the area could potentially be approved. Much more was requested than what was on the list.

The process was started in May 2015 and the approval didn't come through until the end of December 2015. As a Credit Union, we understand the need for a process but this process is cumbersome, outdated and often without merit. We file regular call reports, have good audits with NCUA and are not in any regulatory trouble however, during a FOM application process it seems the call reports or NCUA audit has nothing to do with the stability of our Credit Union. We receive no credit for running a great institution.

Items that should be simple, like tract boundaries, take an unreasonable amount of time to write up when the tract maps come from the CDFI website. Also, we wrote of the tract boundaries

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Florida's Emerald Coast and the Mobile Bay Area*

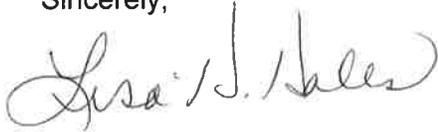
Your Savings Federal Insured by \$250,000
and backed by the full faith and credit of the United States Government
NCUA
National Credit Union Administration, a U.S. Government Agency

individually and then had to go back and write it up again using the borders of the entire area. Do the analyst's really go through and read this to check behind what is being submitted to make sure it is correct?

During the recent process the Credit Union was asked to provide the marketing media we planned to use based on various demographics such as under 18 years old, over 65 years old, underserved and females. The Credit Union has never been asked to provide this in previous applications and this wasn't disclosed in the application instructions in enough detail to provide this information at the being of the process.

Thank you very much for the opportunity to comment on this proposed regulation. I applaud the agency's willingness to amend the Chartering and FOM Manual to provide much-needed relief for the credit union industry. While I strongly support this proposal, I encourage the agency to consider the recommendations outlined above, as I believe these suggestions will meet the needs for credit unions. If I can be a source of any further information on this comment letter, please do not hesitate to contact me at lhales@aacfcu.com or by phone at (334)598-4411 ext. 1307.

Sincerely,

A handwritten signature in cursive script that reads "Lisa H. Hales". The signature is written in dark ink and is positioned to the right of the word "Sincerely,".

Lisa H. Hales
VP of Marketing