

February 04, 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,

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 Clark County Credit Union (CCCU), which serves local government, medical professionals, and select businesses to express support for NCUA's proposed field of membership rule.

While Clark County Credit Union is a privately insured and state chartered credit union, the impact of the proposed changes are positive for the credit union movement. The changes will create a greater ability for credit unions to open their field of membership to better serve the communities they participate in. Two specific areas of improvement would be in the office and industrial park tenants for multiple common bonds and increasing the stand alone feasibility for groups between 3,000 & 5,000.

The proposed changes to field of membership will allow for services to be expanded to communities that credit unions serve and would improve the federal charter to be more competitive with state charters. 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,

Matt Kershaw  
President / CEO  
Clark County CU

cc: CUNA, CCUL