

January 27, 2016

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

Re: Field of Membership

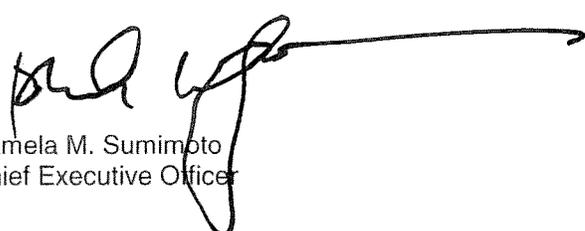
Dear Mr. Poliquin

Thank you for the opportunity to comment on this important issue. We applaud NCUA for recognizing the dated nature of the agency's field of membership requirements and seeking the opportunity to modernize it. Innovation and courage are needed from NCUA to change field of membership rules to ensure the federal charter remains viable for years to come.

The Hawaiian Electric Employees Federal Credit Union is a small credit union just over \$35 million and we appreciate the proposed changes. We are always looking at options to grow our membership, especially in light of the merger of our parent sponsor. Consumers deserve choices on where they obtain financial services, and we want to continue to be part of that choice. The proposed rule would provide federal credit unions the opportunity to diversify their field of membership, as opposed to functioning within its current limitations. We are excited to grow our membership and this proposed rule could help us.

The proposal you are considering is a step in the right direction toward making sure credit unions can fully serve their communities for future generations.

Thank you for the opportunity to hear our thoughts,


Pamela M. Sumimoto
Chief Executive Officer