



February 4, 2016

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

Re: Notice of Proposed Rulemaking – Chartering and Field of Membership Manual
NCUA RIN 3133 – AE31

Dear Mr. Poliquin:

Amplify Federal Credit Union (“Amplify”) is a 50-year old, \$750-million community chartered credit union with eight (8) branch offices serving over 55,000 members in and around Austin, Texas. Amplify converted from a single common bond charter to a community common bond charter in 2004 serving the Austin-Round Rock Metropolitan Statistical Area (Austin MSA).

We appreciate and support NCUA’s efforts to ease the burden for credit unions to provide services to their 100M+ members. The proposal represents needed improvement over current field of membership rules and should prove beneficial for all credit union charters.

The proposed rule is well within NCUA’s statutory authority and will allow credit unions greater flexibility in serving those who share a common bond. In fact, we believe that statute would allow even broader changes. Although some of the changes may not directly impact Amplify’s operations, please consider our specific comments below:

Arbitrary Limitations

We encourage the NCUA to provide more flexibility for credit unions, especially when it comes to arbitrary population limitations defining communities for field of membership purposes.

Specifically, the NCUA should eliminate the 2.5 million population limit applied to the “statistical area” definition. There is no statutory requirement or basis to apply such a rigid limit to a local community. Further, a community should not be construed based on population, but rather by interaction or shared common interests of its members. A community is a community or it’s not, and population should not be a determining criteria.

As an example, the Austin MSA experienced a 13.2% population growth from 2010-15 resulting in over 2 million current residents. As many credit unions operate in similarly situated markets with changing demographics, this limitation could soon have serious unintended consequences for us when determining and defining the local community that we serve.

Likewise, we encourage the NCUA to eliminate the arbitrary rural district population limitation (1 million) similar to the above reasoning. Let credit unions serve their local communities without the restriction of arbitrary limitations that are not required by statute.

Service Facility

We sincerely appreciate the NCUA's recognition of the rapidly expansive nature of the digital age. As our members continue to demand greater convenience and remote access to products and services, modern technology continues to provide platforms for credit unions to reach their members regardless of geographic location. We support the inclusion of online access to services as a service facility for multiple common bond credit unions to serve select employer groups (SEGs).

Competition

Stand firm! As you continue to hear the rhetoric presented by those opposed to these common sense changes, please do not allow this "noise" to persuade the Board from taking the appropriate actions being proposed. In our view, everything proposed is already within the scope of the statute. Field of Membership modernization is an important next step to maximize access to fair and affordable financial services to best serve 100M+ credit union members and the nations' consumers.

We appreciate the opportunity to comment on this proposal. We applaud the agency's willingness to amend the Chartering and Field of Membership Manual. While we strongly support this proposal, we encourage the agency to consider the recommendations outlined above, as we believe these suggestions will meet the needs of credit unions today and well into the future. If you have any questions regarding our comment letter, please do not hesitate to contact me.

Regards,



Paul Trylko
President/CEO
Amplify Federal Credit Union

C: Suzanne Yashewski, SVP Regulatory Compliance Counsel,
Cornerstone Credit Union League

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