



P.O. Box 862998
 220 Paul W. Bryant Drive, East
 Tuscaloosa, AL 35486-0027
 Phone 888.817.2002
 Fax 205.348.2338

To Gerard Poliquin, Secretary of the Board, National Credit Union Administration

From: Steve Swofford, President, Alabama Credit Union

Date: February 8, 2016

■ Re: FOM Proposal

■ We appreciate the opportunity to comment on the proposed changes to the National Credit Union Administration's Field of Membership Regulation. As a state chartered credit union, these changes would not directly affect our operation. However, we support the concept of a strong dual chartering system, and these changes will afford Federal credit unions much of the same flexibility that state chartered credit unions already enjoy. For that reason, we support the changes as distributed.

■ In our view, the proposed changes recognize the evolution in the way that consumers access necessary services, and the technological capabilities that credit unions now have to serve their needs. The proposal also takes into consideration that communities are no longer strictly defined by county and state lines, nor by governmental definition.

■ We especially agree with the removal of the Core area service requirement, in that it forced a credit union wanting to serve a community to provide service to areas it might not believe to be profitable or necessary. We also agree with the larger population number for rural areas, in that much of Alabama is rural in nature, and yet may have a large population center within the area that caused the population to exceed the 250,000 standard. The 1 million population definition is a significant improvement.

■ So overall, we support the proposed regulation as presented. We would suggest the NCUA Board ignore the comments made by the banking community, as they would prefer credit unions be restricted to the rules as originally established in the 1930's. In fact, the banks

have had the benefit of modern rulemaking for decades, while credit unions typically lagged behind. Please consider only credit union and credit union trade association comments when crafting your final regulation.

If you have questions or comments regarding this response, please let me know.