

February 08, 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 CommunityAmerica Credit Union, a \$2.1 billion state chartered, federally insured credit union.

CommunityAmerica appreciates the opportunity to provide comments on the proposed amendments, as well as the NCUA's continued efforts to look for ways to modernize its rules and regulations.

Although we are state chartered, we wholeheartedly support the credit union movement and credit unions' ability to make the best decisions for their members, regardless of choice of charter. We remain committed to the dual charter system, as it provides incentive for the NCUA and state regulators to continue to move policies forward that create a broader path for operating authority.

Although the changes may not provide a direct immediate impact to a state chartered credit union like CommunityAmerica, it does give additional flexibility if a state chartered wants to explore the possibility of changing to a federally chartered credit union. In addition, these changes (and more as suggested by our trade groups) help strengthen both charter types through innovation and healthy competition.

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, with consideration for the additions suggested by credit union trade groups, so that credit unions can take advantage of the regulatory relief and field of membership flexibility in the proposed rule.

Sincerely,

Tracey Hannah
Director, Government Affairs & Regulatory Counsel
CommunityAmerica Credit Union

cc: CUNA, CCUL