

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,

I am writing today in support of the proposed adjustment to NCUA's Field of Membership regulation. Although the credit union I lead is state chartered, I recognize the importance of allowing federal credit unions to regain the field of membership opportunities that have been taken from them within the past decade. To have an effective dual chartering system, it is critical that there be appropriate competitive tension between the charters available to federal credit unions and those available to state credit unions. The results from recent years, in which many more federal credit unions have opted to convert to state charters than vice-versa, clearly demonstrates that an imbalance currently exists that discourages a federal charter. That is somewhat incredible given that one of the significant advantages of the federal charter is ability to have a single examination from an agency that is both the regulator and insurer of the institution. I believe this proposal helps begin rectifying that imbalance.

Especially noteworthy items in the proposal that are good to see include:

- Allowing credit unions reasonable access to areas that are contiguous to those they already serve
  
- Including Congressional districts as well defined local communities, and
  
- The expansion of rural districts to more realistic population sizes

I also applaud any efforts to streamline the process for a federal credit union to expand its field of membership, as the current system in which it can take a year or more to do so is clearly in need of correction.

More options for expansions of credit union charters means more options for affordable financial services for American consumers, which is the fundamental core of the service credit unions provide to our nation's economy. Therefore, this proposal serves to strengthen both the credit unions for which NCUA is responsible and the economy at large.

Finally, as the agency analyzes the public comments relative to this proposal, the fact that the numerous congressional responses that have been submitted appear to universally favor this proposal should speak loudly to the agency and the members of the Board. Those should carry far more weight than the naysayers from the bank industry and its lobbyists whose only interest is to continue finding ways to limit competition.

I eagerly urge each member of the NCUA Board to vote in favor of this proposal.

Sincerely,

Wally Murray  
President/CEO  
Greater Nevada CU

cc: CUNA, CCUL