

From: [Bill Schultz x1118](#)
To: [Regulatory Comments](#)
Subject: Proposed FOM Rules
Date: Wednesday, November 16, 2016 11:32:13 AM
Attachments: [image001.png](#)
[image002.png](#)
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To the Board of the NCUA:

I would like to extend my sincere thanks for the newly proposed changes to Field of Membership rules. I am the compliance officer for a \$400 million community based credit union. We have worked for years trying to expand to underserved areas surrounding our current community. We have run into numerous barriers due to the current FOM rules. Under current rules we are unable to expand into surrounding areas because they do not meet the definition of underserved since they are wealthier communities located in the mountains, but they are not served by any financial institutions due to their remote locations. Also, if we were to add new geographical areas, the NCUA would require us to cease adding membership in our current defined communities. The new proposals would allow our Credit Union to continue serving our existing communities while providing much needed services to surrounding rural communities. Credit Unions exist to serve our members and our communities and it is counterintuitive to have rules in place that hinder that mission. The proposed rules will more accurately reflect the mission of the Credit Union movement. It is my hope these new rules will become permanent in the near future. This will have nothing but positive outcomes for Americans across the country.

Thank you,



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