

**From:** [Jim Lumpkin](#)  
**To:** [Regulatory Comments](#)  
**Subject:** 12 CFR Part 701 Chartering and Field of Membership  
**Date:** Monday, November 21, 2016 5:34:06 PM

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NCUA Board:

Thank you for your recent proposal to update the Chartering and Field of Membership Manual. I believe your proposal to expand the population limit from 2.5 Million to 10 million that applies to a community consisting of a CBSA or Combined Statistical Area could be adequately served by some credit unions. Additionally, the Boards consideration of the 13 criteria listed in the proposal for evaluating the establishment of a WDLC is well thought out, and provides needed flexibility for credit unions wishing to establish a WDLC that is not based solely on a Core Based Statistical Area or portion thereof, or a Single Political Jurisdiction.

Your continued efforts to simplify and improve the ability a credit union to serve its members and potential members are greatly appreciated. Thank you for your consideration of the input provided during this comment period.

Jim Lumpkin  
President/CEO  
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