



November 29, 2016

National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Dear Chairman Metsger and Mr. McWatters:

The STCU Management Team, on behalf of more than 600 STCU employees, is writing to support the proposed rule change regarding Community Common Bonds. As you're aware, the change would:

- Increase to 10 million people the limit for community charters consisting of a combined statistical area.
- Create an alternative, streamlined narrative approach for petitioning to establish a well-defined community of interest.
- Allow a credit union to designate a portion of a metropolitan division as a community without regard to division or boundaries.

As the recent election has made clear, many Americans continue to struggle with daily financial needs. Credit unions offer assistance through lower fees and more favorable rates than for-profit financial institutions. Here in Washington State, a family can save more than \$100 a year just by switching their accounts to a credit union. That's one of the ways we rise to the mission spelled out in the Credit Union Membership Access Act of 1998: "... meeting the credit and savings needs of consumers, especially persons of modest means."

Because they are on the ground, serving their memberships and their communities, the leaders of federally chartered credit unions are best prepared to determine their ideal field of membership, albeit with NCUA guidance, oversight, and approval. The more flexibility provided by that process, the better those credit union boards can shape their FOMs for the greatest good.

While this change would not directly benefit STCU or other state-chartered credit unions, we feel strongly that expanding the charter for federally chartered credit unions is good for the industry and good for American consumers. Indirectly, the change would buoy state-chartered credit unions, as a strong industry lifts us all.

Thank you for the opportunity to comment.

Sincerely,

Tom Johnson, President/CEO
 Belinda Caillouet, COO/CIO
 Ev Hopkins, CAO
 Lindsey Myhre, VP Finance
 Laura Wood, VP HR/OD
 Patricia Kelly, VP IT
 David Flood, VP Lending
 Barb Richey, VP Marketing
 Tammy Fleiger, VP Operations
 Sean Watt, VP Retail Delivery

Tom Johnson

B. Caillouet

Ev Hopkins

Lindsey Myhre

Laura Wood

Patricia Kelly

David Flood

Barb Richey

Tammy Fleiger

Sean P. Watt



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Dear Chairman Metsger and Mr. McWatters:

On behalf of our 161,000 members, the Board of Directors of STCU is writing to support the proposed rule change regarding Community Common Bonds. As you're aware, the change would:

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Thank you for the opportunity to comment.

Sincerely,

Jay Walter, Board Chair
 Dolores Humiston, Board Vice Chair
 Terri Alvarado, Board Director
 Catherine Brazil, Board Director
 Nick Leute, Board Director
 Bob Loomis, Board Director
 Chris Morlan, Board Director
 Mike Rennaker, Board Director
 Wally Stanley, Board Director