



December 6, 2016

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

Sent via email to: regcomments@ncua.gov

Re: Comments on Notice of Proposed Rulemaking Regarding Community Common Bond

Dear Mr. Poliquin:

This letter represents the views of the Cornerstone Credit Union League ["Cornerstone"] in response to the National Credit Union Administration's ["NCUA"] proposal regarding field of membership ["FOM"] rules in relation to community charters. Cornerstone is the official trade association serving 546 federal and state credit unions in Arkansas, Oklahoma, and Texas combined, and more than 8.9 million credit union members. Cornerstone appreciates the opportunity to comment on this very important issue.

Cornerstone commends NCUA for its adoption of recent changes to the Chartering and Field of Membership Manual, and we support NCUA's efforts to further modernize outdated FOM restrictions in the current proposal.

We support amending the chartering and field of membership rules to give applicants for community charter approval, expansion, or conversion the option, in lieu of a presumptive community, to submit a narrative to establish common interests or interaction among residents of the area it proposes to serve, thus qualifying the area as a well-defined local community. We support the suggested criteria to be used in evaluating the presence of interaction and/or common interest among residents in these areas. Such an approach provides flexibility to credit unions seeking to best serve their communities.

We also support NCUA's proposal to increase up to 10 million the population limit on a community consisting of a statistical area or a portion thereof. This approach anticipates population growth over time, and also provides some parity with state chartered credit unions in many states that permit a statewide FOM.

We support permitting a credit union to designate a portion of an area as its community without regard to division boundaries when such an area is subdivided into metropolitan divisions. The

proposed amendment fixes inconsistencies in the treatment of a portion of a core based statistical area versus that of a combined statistical area.

In sum, we support NCUA's efforts to ease outdated field of membership restrictions. Thank you very much for considering our comments. If you have any questions, please do not hesitate to contact me at (512) 853-8516.

Sincerely,



Suzanne Yashewski
SVP Regulatory Compliance Counsel
Cornerstone Credit Union League
1122 Colorado St Suite 1307
Austin TX 78701
(512) 853-8516
syashewski@cornerstoneleague.coop