

December 08, 2016

National Credit Union Administration
Gerald Poliquin, Secretary of the Board
1775 Duke Street
Alexandria, VA 22314-3428

RE: Comments on Proposed Rulemaking Regarding Community Common Bond

Dear Mr. Gerald Poliquin,

I am writing on behalf of Fairfax County Federal Credit Union, which serves those that work, worship and live in Fairfax, Virginia. We have just over 16,500 members and \$400,000,000 in assets. Fairfax County FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the field of membership rule.

The board and management of the credit union are in strong support of any regulatory change that allows for greater access to credit union services. We feel strongly that everyone benefits from more credit unions being able to serve the financial needs of our country and the proposed regulation is a positive step in the right direction. Additionally, any regulatory relief that expands a credit union's ability to serve neighboring communities by offering more people membership in a credit union will strengthen that community, the credit union and the credit union system as a whole. In addition to improving the financial lives of individuals, credit unions (that had been limited) in serving adjacent communities will see their economic health improved. With improved economies of scale on products and services, the diffusion of operational costs associated with regulatory compliance and the ability to use more effective marketing strategies in a local community, credit unions and households will reap economic benefits.

The only concern the credit union has with the proposed Field of Membership Amendment is that it does not address the ability of credit unions to ever overlap a field of membership with credit unions that were granted multi-common bond AND community charters through forced or administrative merger. These forced and administrative mergers are granted by the NCUA frequently without solicitation of local credit unions. Moreover, the permanent nature of the field of membership overlap is unfair to other credit unions and not necessary for the financial health of the succeeding credit union. If a permanent field of membership exclusion by NCUA is necessary for the success of the succeeding credit union, then it will be at the detriment of the local families who are, subsequently, limited to which credit union they will be allowed to join. This is particularly egregious when a credit union is granted an overlapping field of membership that it would not otherwise be allowed to serve; such as a SEG based credit union receiving (in perpetuity) one, or more community based field(s) of membership through a forced merger. The practice of approving some credit unions multiple communities, SEG, association and TIF fields of membership, but not allowing all credit unions the same charter is not only inherently prejudicial it is also detrimental to the financial health of affected credit unions and the general population.

Thank you for the opportunity to comment on this Proposed Rule and for considering our views on NCUA's FOM rule.

Sincerely,

Joseph D. Thomas, Jr.
President/CEO
Fairfax County FCU

cc: CUNA, CCUL