



December 9, 2016

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

RE: Comments – Proposed Rule: Chartering and Field of Membership Manual, 12 CFR Part 701,  
Issue Date 10/27/2016

Dear Mr. Poliquin:

I submit this comment letter as a member of and in my professional role as the Vice President of Risk Management at ABNB FCU in Virginia. ABNB is a \$529M community chartered credit union with 18 branch offices serving 55,977 members in a portion of the Virginia Beach-Norfolk Metropolitan Statistical Area which includes Isle of Wight and Southampton Counties, Virginia, along with the independent cities of Franklin, Chesapeake, Norfolk, Portsmouth, Suffolk and Virginia Beach, Virginia.

First let me express our gratitude to the Board on its recent adoption of changes to the Chartering and Field of Membership Manual that modernized the federal charter providing federal charters with more flexibility to serve their communities, compete in their marketplaces and remain a viable option to all consumers. More specifically we appreciate the acceptance of a Combined Statistical Area as a presumptive definition of community. ABNB intend to avail itself of this change.

The proposed rule would increase the community population limit to 10 million from 2.5 million for a Core Based Statistical Area or a Combined Statistical area. Neither the Census Bureau nor the Office of Management and Budget recognizes any population limit. I would urge NCUA to follow their lead and not place any artificial population limits on any definition of a community.

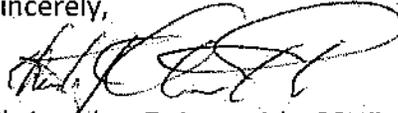
The proposal would amend the chartering and field of membership rules providing an applicant for a community charter with the option to submit a narrative to establish common interests or interaction amongst the residents of the area proposed demonstrating that the proposed community is a well-defined local community. ABNB supports the suggested criteria in the proposed appendix and the agency's use of a totality of circumstances review. I would urge NCUA to offer both the choices of presumptive community and the narrative approach.

The proposed rule corrects a conflict in the treatment of a proposed community

consisting of a portion of a Core Based Statistical Area with that of portion a Combined Statistical Area. ABNB supports the concept of permitting a credit union to designate a portion of a CBSA as its community without regard to statistical area boundaries.

Thank you very much for the opportunity to comment on this proposed regulation. We look forward to quick action by the Board.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris Anuswith", written over a horizontal line.

Christopher E. Anuswith, CCUE, CUERME, NCCO, NCRM  
Vice President of Risk Management

cc: NAFCU  
CUNA  
VCUL