

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

Dear Mr. Poliquin:

Thank you for the opportunity to provide the following comments about the second field of membership proposal issued for public comment by the NCUA Board.

The Board and senior management of Workers Credit Union unequivocally support the three primary provisions of the proposed rule and would like see them incorporated in the recently approved FOM rule.

While it may seem unusual for a state-chartered credit union to comment on proposed rules that specifically apply to federal credit unions, they are relevant to state chartered credit unions such as Workers' Credit Union given that the overwhelming majority of states, including the Commonwealth of Massachusetts, have laws and regulations that recognize parity with the federal rules.

Regarding the authorization of a narrative option for federal credit unions that seek to serve a well-defined community consisting of political jurisdictions that do not fall neatly within a metropolitan statistical area or combined statistical area, we feel this is an option that should be provided for all credit unions; however, within the purview of the regulation, certainly for federal credit unions.

Workers strongly supports eliminating the arbitrary population cap in the definition of a community in its entirety. The determining factors for a well- defined local community should be documentation of the interaction standard either through the defined MSA and CSA status as outlined in the FOM rule approved in October 2016 or through the narrative process as outlined in this proposed rule. Either a community qualifies as an interactive and well-defined local community or it does not. Other than as an anti-competitive limitation desired by the banking industry, we fail to see the necessity of a population cap at all.

Should the Board determine a population cap is nonetheless necessary, then a number such as ten million that is sufficient to serve our larger urban communities is more applicable than a 2.5 million population cap. We remain unclear why a credit union should be prevented from serving its members a few miles across town simply because of an arbitrary limitation on population that has no relationship to the size of the community. If credit unions must remain

arbitrarily limited in the number of community members that can benefit from our unique and essential services, please allow us to assist as many people in our communities as we can.

The provision to permit a credit union to designate a portion of a CBSA as its community without regard to division boundaries certainly makes sense and is consistent with the earlier FOM rules approved by the NCUA Board.

Mr. Poliquin, we appreciate the opportunity to express our views on this proposed rule. If we can provide additional information in support of our comment letter, please do not hesitate to contact us.

Sincerely,



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