

December 09, 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,

Thank you for the opportunity to comment on the proposed amendment to the Field of Membership rules. The Utah Credit Union Association represents 67 credit unions based or operating in Utah, with 2.1 million memberships.

On behalf of our Association, I would like to express strong support of the proposed amendment. Specifically, we support:

* The move to a narrative to establish common interests or interaction among residents of an area;

*€The increase of a community within a statistical area or a portion thereof to 10 million; and

These amendments are logical steps in the right direction. The move to a narrative approach provides credit unions with greater flexibility in seeking to change their fields of membership. We always favor credit unions having greater flexibility in meeting requirements, as any industry would.

While we support the move to a 10-million person limit, we generally favor removal of a cap, entirely. If a community is a community, it should not be limited to anything less than the entire size of the community. While 10 million is still a limit, it will certainly include more entire communities than the current limit of 2.5 million, and is therefore a move in the right direction.

For example, Utah has a one combined statistical area, which as of 2014 had an estimated population of 2,423,912 people. The area's population has likely grown above 2.5 million people by now. It would be unfortunate if citizens of the community were denied membership in a credit union they wanted to join even though they were still part of the community. The increase to 10 million would allow a credit union to serve this entire community.

There are many good reasons to allow larger communities. To name just two: technology has made it feasible for credit unions to serve large communities; and larger communities reduce risk to the credit union by diversifying membership.

There is little question regarding what bankers will do regarding the NCUA's field of membership rules and with this new proposal. We encourage the NCUA to continue on despite attempts by bankers to increase bank stockholder profits by limiting American access to credit unions.

Those who established laws organizing credit unions wanted as many Americans as possible to have access to credit unions. As the economy and industry and technology have evolved, credit unions have naturally grown and must grow.

Thank you for a proactive, forward-looking proposal.

Sincerely,

Stephen Nelson
VP-Credit Union Support
Utah Credit Union Association

cc: CUNA, CCUL