

From: [Ron Johnson](#)
To: [Regulatory Comments](#)
Subject: Bank of Commerce Comments on Chartering and Field of Membership Proposed Rule
Date: Friday, November 22, 2019 11:40:08 AM

Dear Secretary of the Board Poliquin,

I am writing in response to the National Credit Union Administration's (NCUA) proposal to amend its chartering and field of membership (FOM) rules with respect to applicants for a community charter approval, expansion, or conversion. Bank of Commerce does not believe that the proposed framework will adequately guard against discriminatory redlining and recommends that NCUA adopt the anti-discrimination tools utilized by other federal banking agencies.

If the agency wants to ensure that its supervised federal credit unions do not discriminate by redlining urban cores, then it should employ some of the same tests and assessments that the FDIC uses with my bank.

Sincerely,

Ron Johnson
EVP & CFO
Bank of Commerce
3113 S 25th E
Ammon, ID 83406
rj@bankofcommerce.org