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December 6, 2019

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

Sent via: regcomments@ncua.gov

Re: 12 CFR Part 701, RIN 3133–AF06, Chartering and Field of Membership

On behalf of the members of the MD|DC Credit Union Association and the 125 Credit Unions and their 2.2 million members that we represent, we appreciate the opportunity to comment on the National Credit Union Administration's Chartering and Field of Membership proposed rule.

We support the Board's proposal to re-adopt a provision to allow an applicant to designate a Combined Statistical Area (CSA), or an individual, contiguous portion thereof, as a well-defined local community (WDLC), provided that the chosen area has a population of 2.5 million or less, as well as the Board's further explanation and support for its elimination of the requirement to serve the CBSA's core area as provided for in a 2016 rulemaking.

The core area service requirement is not mandated by the Federal Credit Union Act and creates an unnecessary constraint on who Federal Credit Unions (FCUs) may serve. The removal of this requirement will provide FCUs with flexibility to serve their specific areas in a manner that best accommodates the needs of the members. The American Bankers Association's comments that argue that removal of this provision would allow for "redlining" are not founded in fact. Elimination of the core area service requirement will provide additional flexibility to community-based FCUs, thereby allowing newly chartered or expanded FCUs to provide financial services to low- and moderate-income segments of communities that are outside the core.

Credit unions have the "specific mission of meeting the credit and savings needs of consumers, especially persons of modest means." Removal of the arbitrary core area service requirement will allow FCUs to better meet this mission and accordingly, we support the Board's proposal.

We always appreciate the invitation to comment. We look forward to continued conversations and remain a committed partner.

Sincerely,

A handwritten signature in blue ink that reads "John Bratsakis". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

John Bratsakis
President/CEO
MD|DC Credit Union Association