

From: [Mary Isaacs](#)
To: [Regulatory Comments](#)
Subject: Comments on Chartering and Field of Membership Proposed Rules
Date: Sunday, December 8, 2019 3:23:29 PM
Attachments: [image015.png](#)
[image016.png](#)
[image017.png](#)
[image018.png](#)
[image019.png](#)
[image020.png](#)
[image021.png](#)

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We fully support any changes that promote expansion of credit union membership access, while guarding against discrimination. The proposed changes support the spirit of the Credit Union Membership Access Act of 1998 (CUMAA) which is to meet the savings needs of consumers, especially those with modest means/the underserved. We do not feel that the elimination of the core area service requirement for CBSAs will lead to redlining or other forms of discrimination. It makes logical sense to make this change in that we also agree with the D.C. Circuit court findings that allowing for larger communities promotes the economic viability of community FCUs. Credit Unions are not covered under the Community Reinvestment Act (CRA) for two reasons. 1) They are basically created to serve their communities, and 2) There is little evidence that they have not served their communities. In 1998 when CUMAA was enacted, the “findings” supported this. They stated, “Credit Unions...have the specified mission of meeting the credit and savings needs of consumers, especially persons of modest means”.

Thank you for your work on this.



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