



November 20, 2019

Gerard Poliquin, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428

RE: Chartering and Field of Membership
RIN: 3133-AF06; Document Number: 2019-23680

Dear Secretary Poliquin,

GECU appreciates the opportunity to comment on the National Credit Union Association's (NCUA) proposal regarding updates to Chartering and Field of Membership. As the largest locally owned state-chartered credit union in El Paso, TX, serving a membership of over 390,800, and with assets greater than \$2.8 billion, we commend the Agency on its commitment to meet the credit and saving needs of consumers, especially those of modest means.

GECU supports the proposal to amend the chartering and field of membership rules in relation to community charters. Re-adopting a provision to allow an applicant to designate a Combined Statistical Area (CSA), or an individual, contiguous portion of CSA, as a well-defined local community (WDLC), provided that the chosen area has a population of 2.5 million or less and eliminating the requirement to serve the core of a Core-Based Statistical Area (CBSA) frees credit unions to focus on how to best serve the area and determine which areas are in most need of their services. As provided within the text of the proposal, it is apparent that outlining areas of CBSAs, may not have the same means as those areas in the "heart" of the CBSAs. Additionally, it will allow for credit unions to better facilitate their services to areas that may not have access to financial services within the credit unions' actual means. In some cases, it may even result in a credit union's ability to serve surrounding areas and further build on their assets before reaching the "core area" of a CBSA.

GECU further supports the proposal's provisions providing the NCUA with the explicit authority to reject a credit union application for CSAs and CBSAs if the agency determines that the field of membership selection reflects discrimination. Credit unions have long served the low- and moderate-income segments of communities as it is the foundation of our existence. This fundamental principal will be further instilled and regulated by specifically declaring in the Chartering and Field of Membership Manual the NCUA's ability to require additional information on how the credit union's business needs

support its selection, conduct any further inquiry that it deems appropriate, and reject either an initial charter application, an expansion or amendment request if the NCUA determines that a community-based credit union has chosen its specific geographic field of membership based on discriminatory intent or effect. GECU does not feel the ability to request supplemental information would be too burdensome for applicants because, as written, the NCUA may request only as warranted. Should the Office of Credit Union Resources and Expansion (CURE) see any indications of discrimination, it would be within their right and intended purpose of the NCUA to preserve credit unions mission to serve the underserved or those of modest means, to ensure the request is being made for legal and business judgment by requesting information to remedy that concern or provide them definitive resolve to decline the application.

Again, we appreciate the opportunity to comment on the NCUA's proposal. If you have questions regarding our comments, please contact me directly at (915) 774-8203.

Sincerely,



Crystal Long
President/CEO

CL/dp