

From: [Anita Drentlaw](#)
To: [Regulatory Comments](#)
Subject: New Market Bank's Comments on Chartering and Field of Membership Proposed Rule
Date: Monday, December 9, 2019 4:50:08 PM

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. The proposed rules/framework appears to potentially aid in discriminatory redlining instead of guarding against such behavior. I, along with others from New Market Bank, recommend that the NCUA adopt the anti-discrimination tools utilized by other federal banking agencies.

During our last CRA and compliance exams both conducted in 2019, the FDIC went through extensive testing to make sure we were providing credit to our assessment area as well as serving the needs of low/moderate income consumers and small businesses looking for credit to be extended to them. We are a small bank (\$117MM) in the South metro area of Minneapolis/St. Paul. Although our bank is located in a fairly affluent area of the Twin Cities, we were able to utilize our mortgage products and assist in making mortgage loans to low/moderate income families. Of those loans originated, 10.6% were made to low income families and 12.1% were made to moderate income families. We believe we need to provide products to the entire area we serve and not exclude areas or census tracts that may be considered low/moderate income areas. Our regulators also believe that to be our responsibility and insure by their examination that we follow that requirement.

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 my regulator uses with my bank.

Sincerely,

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