

**From:** [Tracey Pierce](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Bank of Wisconsin Dells Comments on Chartering and Field of Membership Proposed Rule  
**Date:** Monday, December 9, 2019 10:40:07 AM

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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 Wisconsin Dells 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.

We are an institution engaged in hospitality lending. We serve the tourism industry in the state of Wisconsin using our expertise gained over 100 years of banking the Wisconsin Dells area. We help businesses write sound business plans and keep cash flows stable in the ever changing world of hospitality. We also help customers obtain sound financing for their homes.

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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