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Fort Belvoir Federal Credit Union

MAR22'06 AM11:59 BOARD

March 20, 2006

Ms Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428

Dear Ms Rupp:

On behalf of the members of Fort Belvoir Federal Credit Union (FTBFCU), I am writing to comment on IRPS 06-1, the proposed amendments to NCUA's Chartering and Field of Membership rules.

FTBFCU is a multiple common-bond Federal Credit Union with an underserved area. FTBFCU has fully complied with the underserved application commitments. We have created advance pay, credit rebuilder, and first time car buyer's loans; provided bi-lingual financial literacy training; and created safe accounts. In January 2006 we opened a full-service branch office, serving this community six days per week, in the northern-most part of this defined area with a deposit taking automated teller machine. We also have three other full-service branches within the underserved area on the Fort Belvoir military installation. Fort Belvoir is completely within the underserved area, but not in Prince William County.

In planning for the future of our Credit Union, the FTBFCU Board of Directors and management team decided in 2004 to make application for a community charter for Prince William County, fully expecting to retain the members of record and the underserved area potential. Department of Defense regulations today enforce the one Credit Union, one Bank per installation rule. However, it is not certain how long this enforcement will apply with base realignments, Credit Union mergers and Department of Defense personnel changes. To be realistic and secure a solid future for FTBFCU, we have been making plans to apply for Prince William County and to retain our underserved area (which includes Fort Belvoir). Approval of the county without the underserved potential is not an option for FTBFCU. We have invested significant member resources in facilities, products and staffing for the underserved area. In addition, the Department of Defense is expecting FTBFCU to offer membership to the approximately 21,000 new employees that will be realigned to Fort Belvoir. We have made a commitment to the community through Chamber of Commerce partnerships, local small business liaisons and in making our presence known to the local legislative representatives.

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Multiple common-bond Credit Unions with underserved areas that convert to community or back to single common-bond charters should be permitted to retain both the underserved area members of record and the potential members.

Community chartered Credit Unions with underserved areas should be permitted to retain the current and potential members in their underserved areas. Consider their infrastructures, membership base and services designed specifically for the underserved.

We agree with the NCUA that Congress clarified, with the CUMAA regulation, the provision that multiple common-bond Credit Unions were permitted to add underserved areas. We do not, however, think the intent was to exclude service to underserved areas from the non-multiple common-bond or community Credit Unions. Legislative history indicates that Congress was aware of NCUA's policy of granting field of membership expansions for areas that deserved service for the underserved prior to the approval of CUMAA. If a legislative fix is in order to clarify this field of membership rule then we would ask that the NCUA pursue that remedy. There should be no limits when we talk of service to the underserved. This element of our population deserves specialized products and services and financial literacy education programs.

We have no problem with the proposed amendment to require the establishment of a physical branch within the underserved area.

Thank you for the opportunity to share our views on this matter. If you have any questions, please feel free to contact me at 703-730-1800 x 5124.

Sincerely,



Patricia Kimmel
President/CEO