

## Jordan, Sheron

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**From:** \_Regulatory Comments  
**Sent:** Monday, August 06, 2007 7:53 AM  
**To:** Jordan, Sheron  
**Subject:** FW: TCUL Comments to Chartering and Field of Member for FCUs

Subject: TCUL Comments to Chartering and Field of Member for FCUs

August 4, 2007

Mary F. Rupp

Secretary of the Board

National Credit Union Administration

1775 Duke Street

Alexandria, VA 22314-3428

VIA E-mail to: [regcomments@ncua.gov](mailto:regcomments@ncua.gov)

RE: Proposed Amendments to Chartering and Field of Membership for Federal Credit Unions

Dear Sir or Madam:

The Texas Credit Union League [TCUL] appreciates the opportunity to file comments regarding the proposed changes to NCUA's Chartering and Field of Membership Manual. The Texas Credit Union League is the official state trade association serving credit unions in Texas. Organized in 1934, the Texas Credit Union League represents approximately 600 not-for-profit Texas credit unions, which in turn are owned by nearly 7 million members.

### Single Political Jurisdictions

TCUL supports retention of the current process allowing for reduced documentation for single political jurisdictions.

### Multiple Jurisdictions

TCUL supports the proposed new process for community charter approvals for multiple jurisdictions if the federal credit union meets the standard statistical definition of a "well-defined local community."

Regarding a community application that does not meet the established definition of a well-

defined community, TCUL acknowledges the benefits of providing notice. However, TCUL disagrees with the proposed method of providing notice via publication in the Federal Register. Instead, TCUL suggests NCUA adopt a notice provision permitting notification in a local newspaper and permitting interested parties to file comments. Such a method would be less burdensome on the credit unions and is similar to the method banks follow in proposed mergers.

#### 5-Year Limitation

TCUL opposes the proposal for a five year limitation on the exemption from the requirement to submit a narrative summary or supporting documentation with the application when the geographic area has already been approved for another federal credit union. The proposed limit is arbitrary; TCUL recommends a federal census be used instead.

#### Rural District

In general, TCUL supports the proposed definition of "rural district" as it aids a federal credit union's ability to expand its FOM. However, the numbers proposed in the definition are too low. TCUL recommends deletion of the numbers so that the definition would allow for the demonstration of sufficient interaction, but the rural area is not an MSA and does not meet the agency's requirement for a core based statistical area.

#### Marketing Plans

TCUL opposes the proposed requirement for a marketing plan if the documents submitted are or could be made public.

Thank you for the opportunity to comment on this important matter. If you have any questions, please contact Suzanne Yashewski at (512) 853-8516.

Sincerely,

Suzanne Yashewski

VP Regulatory Compliance & Legal Affairs

Texas Credit Union League

(512) 853-8516

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