

February 08, 2016

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

RE: Comments on Notice of Proposed Rulemaking for Field of Membership - RIN: 3133-AE31

Dear Gerald Poliquin,

The National Credit Union Administration Board (NCUA) is proposing to amend part 701 of its rules and regulations to make revisions to the agency's chartering and field of membership manual. I am writing on behalf of Kauai Community FCU, which serves the island of Kauai and Ni'ihau to express support for NCUA's proposed field of membership rule.

We support the proposed FOM changes because we are in the middle of the Pacific Ocean on an island with a population of less than 70,000 people. Being able to expand to the outer islands of Hawaii would at least give us an opportunity to grow and serve those looking for financial services with options that may fit their needs.

There are 6 credit unions locally on the island along with branch offices of the major banks in Hawaii including Bank of Hawaii, First Hawaiian Bank, American Savings Bank and Central Pacific Bank. Other large credit unions in Hawaii have also been looking to expand onto the island of Kauai. Competition is fierce and will continue. The FOM change gives our community-chartered credit union a chance to survive by also expanding our services to consumers situated in rural areas on the other islands.

The change allowing Congressional Districts to be used as a well-defined local community (WDLC), would allow us to expand our membership to those who are seeking affordable financial services.

Thank you for the opportunity to comment on this proposed rule and for considering our views on Field of Membership. We urge the agency to approve a final rule soon so that credit unions can take advantage of the regulatory relief and field of membership flexibility in the proposed rule.

Sincerely,

Irving Soto
VP-Business Development/CUSO
Kauai Community FCU

cc: CUNA, CCUL