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June 23, 2023

The Honorable Todd M. Harper, Chairman
The Honorable Kyle S. Hauptman, Vice Chairman
The Honorable Rodney E. Hood, Board Member
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

RE: Field of Membership Reform and Surviving “Immediate Family”

Dear Chairman Harper, Vice Chairman Hauptman, and Board Member Hood:

I am writing to request your consideration of an important matter on behalf of NCOFCU's members. There is a small, yet meaningful, change that can be made to the Manual in accordance with the FCU Act that would greatly benefit our credit unions and its members. By expanding membership eligibility to include all "immediate family" and redefining "immediate family" to include all blood and legal family relationships or "next of kin," we can facilitate more efficient transfer of wealth within family units, maintain and strengthen member relationships, and contribute to the continued growth of the credit union industry.

I urge the NCUA to take immediate action to amend the Manual as described above. If you have any questions or require additional information, please do not hesitate to contact me at (305) 951-3306 | ceo@ncofcu.org.

Thank you for your time and consideration.

Grant Sheehan

Grant J. Sheehan CEO
National Council of Firefighter Credit Unions (NCOFCU)

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