



NATIONAL CREDIT UNION ADMINISTRATION

WASHINGTON, D.C. 20456

January 31, 1991

Mr. George A. Hammerton
President/CEO
Navy Kwest Federal Credit Union
P.O. Box 1898
Key West, FL 33041-1898

Re: Field of Membership (Your December 21, 1990,
Letter)

Dear Mr. Hammerton:

You have asked for guidance on the "reside or work" requirement in Navy Kwest Federal Credit Union's defined community field of membership. Your question does not lend itself to a general interpretation because the questioned phrase, in most cases, calls for a factual determination. We do note that Interpretive Ruling and Policy Statement 89-1 states that residents must commingle and interact regularly in order for community field of membership standards to be met. (See 54 Fed. Reg. 31170, July 27, 1989.) There are many permutations to your question, so if you have a specific question (i.e. are college students residents) or unusual fact scenario (i.e. individuals who are only winter residents), please contact us. We would note that persons who vacation in an area for a short period of time (e.g. two weeks) would not come within a community credit union's field of membership. We have also stated previously that an individual who merely owns an investment property within a defined community, does not live within the community and has minimal contact with the community, does not "reside or work" in the community and therefore would not be part of a community federal credit union's field of membership.

Sincerely,

HATTIE M. ULAN
Associate General Counsel

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SSIC 6010
90-1231

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Part K Field of Membership