

December 23, 2015

Mr. Gerald Poliquin
Secretary to the Board
National Credit Union Administration
1775 Duke Street
Alexandria VA 22314

RE: Comment Letter for proposed Field of Membership Rule

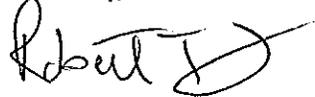
Dear Mr. Poliquin:

I am writing this comment letter on behalf of NorthCountry Federal Credit Union. First, let me express that both the Board and staff deserve significant credit for the proposal which represents a major improvement in the existing field of membership regulations and enhances the value of the Federal Credit Union charter. Also, it is our assessment that the changes are easily allowed under the Federal Credit Union Act and are therefore legal. Being based in Vermont, we were happy to see that a Congressional District meets the definition of a community in the proposal. This proposal helps bring parity with our state regulator which has already approved a state charter consistent with Vermont's single congressional district. While we are strongly in favor of Field of Membership reform, we also want to highlight a few areas we believe can be amended to make further improvements:

- We urge the Board to further consider mergers and FOM implications as part of this rule. We recommend flexibility for FOM expansion to help with voluntary mergers where all parties (members, credit union(s), regulator/insurer) benefit from mergers occurring before reaching the "danger of insolvency status".
- We urge the Board to remove all population caps contained in the proposal. Either the area qualifies as a community or it does not. An arbitrary cap is unrelated to whether an area represents a community.
- We urge the Board to consistently apply the revised definition of "service facility" for reasonable proximity purposes across the board and including expansion to underserved areas. Retaining the more restrictive service facility definition may discourage credit unions from serving members residing in underserved communities.

In conclusion, we strongly support the direction of the Field of Membership proposal and request consideration of the above amendments to make the rule more effective for all stakeholders.

Sincerely,



Robert T. Morgan
Chief Executive Officer