

From: [Stephen Mackowitz](#)
To: [Regulatory Comments](#)
Subject: Re: 12 CFR Part 701 – Chartering and Field of Membership Manual; Proposed Rule
Date: Tuesday, February 02, 2016 9:48:57 AM

February 2, 2016

**Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428**

Re: 12 CFR Part 701 – Chartering and Field of Membership Manual; Proposed Rule

Dear Mr. Poliquin:

I am a Senior Vice President of a Massachusetts credit union. I appreciate the opportunity to comment on proposed changes to the Chartering and Field of Membership Manual regulations

Comments on the Proposed Rule

Overall, I support for the changes proposed. Especially important in our technology era is the revised definition of “Service Facility” to include a transactional web site. I think the minimum membership for a full-service credit union to be viable is much higher than it once was and will continue to increase. 5000 should be the absolute minimum; 7,500 would seem to be a better minimum.

Thank you again for the chance to share my views.

Sincerely,

Stephen K. Mackowitz