



February 1, 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 the Vice President of Mortgage Lending at Digital Federal Credit Union (DCU) in Massachusetts. I appreciate the opportunity to comment on proposed changes to the Chartering and Field of Membership Manual regulations. I support the proposed changes, especially expanding and modernizing the definition of “service facility.”

DCU has mortgage loans available in all 50 states based on the geographical diversity of our membership. We fully service the mortgage relationship for the life of the loan remotely by leveraging innovative technology. Mortgage loans are one of our more complicated products, and our members overwhelmingly prefer to complete applications online, sign documents electronically, and communicate via email. We have strong demand for our mortgage products in California, Florida, and Georgia based on the relocation patterns of our membership. We have an opportunity to serve new member groups outside of our branch footprint through the common bonds of their employers under the proposed change.

The geographic diversity of our members demonstrates that we can serve all of their banking needs, including complex transactions, without a branch footprint in all of the areas we serve. The majority of our mortgage loans come from existing members, many of whom have changed employers and relocated to pursue opportunities in the technology field. While we are able to help these members through their existing membership, the current definition creates a barrier for their employers to offer membership to all of their employees. Changing the definition of “service facility” will allow DCU to better serve our growing new membership and the companies that they work for or own.

Thank you for the opportunity to share my opinion on the proposed changes.

Sincerely,

A handwritten signature in black ink that reads "Caleb J. Cook".

Caleb J. Cook
Vice President of Mortgage Lending
Digital Federal Credit Union
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