

O & R UTILITIES EMPLOYEES FEDERAL CREDIT UNION

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

February 2, 2016

Dear Mr. Poliquin

As the President and Chief Executive Officer of O&R Utilities Employees FCU, a multiple common bond credit union, I am writing this letter in support of NCUA's proposed changes to its Chartering and Field of Membership Manual. The existing expansion criteria are too restrictive. Getting across the credit union message to groups and associations is more difficult than at any other point in my career. Anything that NCUA can do to make the addition of new groups easier would be beneficial.

Against this backdrop, I support NCUA's proposals designed to help multiple common bond credit unions add new member groups. My members can now perform a full range of banking transactions online. This technology means that new groups are within "reasonable proximity" to our credit union's service area irrespective of where they are based. NCUA is appropriately proposing to eliminate the requirement that groups can only join if they are near a physical facility.

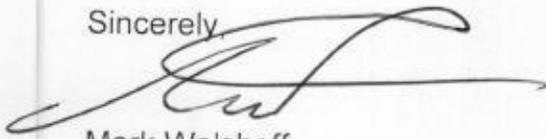
I am also in favor of NCUA's proposal to increase from 3,000 to 5,000 the size of groups that can be added to multiple common bond credit unions without being subject to an overlap analysis. Groups are extremely cautious about joining credit unions and reducing the paperwork and the amount of time it takes to join will help eliminate some of this reluctance. In addition, I believe that the vast majority of groups with 5,000 or fewer members can't form a credit union. In fact, NCUA should consider raising the ceiling even higher than 5,000 members. In an era of chronically low interest rates and fierce competition, most groups with less than 10,000 members should be discouraged from creating a credit union.

If NCUA makes all honorably discharged members of the armed services eligible for credit union membership, my credit union will certainly be interested in making these individuals members. Members of the armed forces continue to be targeted by unscrupulous financial institutions. Allowing discharged members to access credit union services may help mitigate this problem.

As an advocate for the credit union movement, I am also in favor of giving community based credit unions greater flexibility to add areas to their communities. The NCUA's decision to define communities with reference to census bureau geographic designations hurts consumers by denying them the option of joining credit unions and makes it impossible for credit unions to serve Well Defined Local Communities that are in two different Core Based Statistical areas.

These amendments are a top priority for the industry. I urge NCUA to finalize them as quickly as possible.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark Welshoff', written over the word 'Sincerely,'.

Mark Welshoff
President/CEO