

February 04, 2016

National Credit Union Administration
Gerald Poliquin, Secretary of the Board
1775 Duke Street
Alexandria, VA 22314-3428

RE: Comments on Notice of Proposed Rulemaking for Field of Membership - RIN: 3133-AE31

Dear Gerald Poliquin,

The National Credit Union Administration Board (NCUA) is proposing to amend part 701 of its rules and regulations to make revisions to the agency's chartering and field of membership manual. I am writing on behalf of Seaboard Federal Credit Union] which serves Hancock, Penobscot, Waldo and Washington Counties, Maine to express support for NCUA's proposed field of membership rule.

Specifically, I am in favor of increasing the in population limit for rural districts from 250,000 to 1 million. The current limit is rather arbitrary and can easily be exceeded. A 1 million person limit will provide great flexibility in serving underserved populations.

I support the use of Congressional districts as well-defined local community. Because our home office is located at the junction of 3 counties, we had to submit a lengthy and drawn out request to expand our charter. We could serve towns that were 60 miles away from our home office because they were in the same county, but couldn't serve a town across the Penobscot river (the county line) which was less than 1 mile away. A Congressional District by definition indicates a shared interest and common bond and will eliminate illogical charter requests for gerrymandered towns and counties.

Thank you for the opportunity to comment on this proposed rule and for considering our views on Field of Membership. We urge the agency to approve a final rule soon so that credit unions can take advantage of the regulatory relief and field of membership flexibility in the proposed rule.

Sincerely,

Kyle Casburn
President/CEO
Seaboard FCU

cc: CUNA, CCUL