

February 8, 2016

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

RE: Notice of Proposed Rulemaking Regarding Associational Common Bond

Dear Mr. Poliquin,

Voyage Federal Credit Union appreciates the opportunity to provide comment to the National Credit Union Administration (NCUA) with regard to the proposed amendments to Chartering and Field of Membership Manual regarding Associational Common Bond. Voyage FCU has a community charter including 2 counties in the state of South Dakota: Minnehaha and Lincoln Counties. We are located in the city of Sioux Falls, SD, operate 4 locations, and have \$83 million in assets serving over 10,000 members.

Voyage FCU applauds the NCUA for taking positive steps to reduce the unnecessary regulatory burden and we support the NCUA's proposed rule to amend the Chartering and Field of Membership Manual.

Despite what others in the financial industry may try to argue, our credit union continues to operate for the same purpose and upon the same beliefs as those credit unions did when the Federal Credit Union Act was signed into law, namely, that the "credit union is a member-owned, democratically operated, not-for-profit organization managed by a volunteer board of directors, with the specified mission of meeting the credit and savings needs of consumers, especially persons of modest means. The purpose of this credit union is to promote thrift among its members by affording them an opportunity to accumulate their savings and to create for them a source of credit for provident or productive purposes."

Voyage FCU believes that everyone should have the opportunity to be a member-owner of a credit union. This proposed rule will maximize access by removing undue burdens and restrictions on a Federal Credit Union's ability to provide services to consumers who are eligible for FCU membership, particularly those of modest means and those who may not currently be members of a credit union.

We are mindful of the fact that smaller credit unions may not be able to present as compelling an argument for expansion as larger credit unions may be able to. Voyage FCU strongly encourages

the NCUA to recognize the value and strength of the small credit union to serve its community and that the consumer should have access to both large and small credit unions. The NCUA's proposal relating to individual congressional districts would potentially allow credit unions in South Dakota to include the entire state within its Field of Membership. Voyage FCU implores the NCUA to be cognizant that smaller credit unions can serve large geographic spans, such as the entire state of South Dakota, as well as larger credit unions and should be given the same opportunity. Being given the opportunity to expand their service area can help small community chartered credit unions grow their membership and stay in competition with their larger counterparts.

Thank you for this opportunity to share our comments.

Respectfully,

Darla Erb, CCUE
Chief Executive Officer
Voyage Federal Credit Union