



February 5, 2016

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

RE: Comments on 12 CFR Part 701 - Chartering and Field of Membership Manual; Proposed Rule

Dear Mr. Poliquin,

As an employee of Digital Federal Credit Union (DCU), I am writing to you regarding the National Credit Union Administration's proposed rule amending the Chartering and Field of Membership Manual. I commend the effort NCUA is making to modernize the Chartering and Field of Membership Manual and I appreciate the opportunity to comment on the proposed changes.

**Reasonable Proximity through Member's Online Access to Services** – under the current regulation, Reasonable Proximity is based on the location of a “service facility” which is defined as a credit union branch, a shared branch, a mobile branch that makes weekly visits, or a credit union-owned electronic facility. The proposal would amend the rule to allow for modern technology to be utilized in determining whether a “service facility” is present for purposes of demonstrating reasonable proximity to a group.

I support this proposed change. It allows for modern technology, which affords a group access to products and services through online internet channels, such as a transactional website or mobile platform, including the ability to deposit funds, apply for a loan, or disbursing loan proceeds.

**Population Limit as Applied to a Well-Defined Portion of a Core-Based Statistical Area (CBSA)**  
The current regulation states CBSAs with populations that exceed 2.5 million cannot be used as a well-defined local community. The proposal would allow for a portion of CBSA to qualify as a well-defined local community when the population of the CSBA as a whole exceeds 2.5 million.

While I support this provision, I urge the Agency to expand the population limits, ultimately expanding credit union services to more individuals.

**Streamlined Determination of Stand-Alone Feasibility of Groups Greater than 3,000**

The proposal eliminates the current overlap analysis required for groups between 3,000 and 5,000 seeking to form a new credit union. The proposal allows NCUA to accept a written statement indicating the conditions that exist why a group cannot form its own credit union.



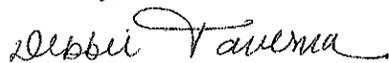
While I support this provision, based on the complexities in creating a viable credit union, I urge the Agency to increase the threshold from 5,000 to at least 10,000.

**Other Persons Eligible for Credit Union Membership** – The proposal would allow a credit union to include within its common bond those who have been honorably discharged as a veteran of any branch of the United States Armed Forces within its affinity groups.

I support this provision and urge the Agency to consider expanding this concept to their affinity groups.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Debbie Taverna".

Debbie Taverna  
Digital Federal Credit Union