

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

Re: Comments on Notice of Proposed Rulemaking Regarding Associational Common Bond-RIN 3133-AE31

Dear Mr. Poliquin,

Central One Federal Credit Union located at 714 Main Street in Shrewsbury, MA 01545 appreciates the opportunity to comment on NCUA's newly proposed Charter and Field of Membership rules.

The credit union changed its charter to a community charter several years ago due to the stagnation of growth within its core affiliated business. The credit union, at that time, argued successfully that "Central Massachusetts" was a well defined geographical area. This allowed the credit union to obtain towns within both Worcester County and Middlesex County in its newly formed FOM.

After this FOM expansion was approved, NCUA altered its rules to make all community based charters consist of Metropolitan Statistical areas (MSA's). The MSA that contains the credit union and its current branches is "Worcester County". Therefore, any time the credit union would pursue FOM changes it would require the elimination of the Middlesex County towns in its new FOM. With Central One FCU being on the perimeter of Worcester County, this places the credit union in undue hardship as it attempts to expand east in any manner.

This rule also places a significant restriction on any mergers even specifically within Worcester County when the main office of the proposed merger partner credit union is not currently within Central One FCU's FOM. The response from NCUA staff has been that Central One FCU would need to change its charter to the MSA, eliminating all Middlesex County towns but allowing for the expansion into the entire Worcester County MSA. Being on the perimeter of Worcester and Middlesex County towns makes this an unattractive option.

The newly proposed rules, as it has been explained to the credit union, would allow our credit union to expand east. This is critical as the credit union's main office is, again located on the eastern perimeter of the Worcester County boundary.

However, the use of the Combined Statistical Area (CSA) rule will certainly support expansion to the eastern direction, the 2 million person cap will all but prevent any legitimate expansion.

As best the credit union can tell, the population limit has no basis, and therefore has no logic to support its existence. It will however place, again, restrictions on the credit union's ability to expand and serve members in any practical way. Many means of communication media currently flow over county lines, and therefore places undue hardship on the credit union to pay for, as an example, radio or print media to communicate to potential members yet some of them who read or hear this communication are not eligible to join.

The credit union feels strongly that if the 2M limit was removed and any basis for expansion was consistent with the use of local print or radio media then it would seem to be a more logical approach to setting boundaries.

We appreciate your time and consideration. Feel free to contact the credit union directly, if you should have any questions.

Sincerely,

David L'Ecuyer
President/CEO
Central One Federal Credit Union
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