New England Federal Credit Union

January 20, 2016

FEB01'16 AM 9:36 BOARD

Mr. Gerard S. Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22134-3428

Re: Proposed Rule on Field of Membership (15-EA-20)

Dear Mr. Poliquin:

For the official record and on behalf of the New England Federal Credit Union, I would like to offer our support regarding NCUA's proposed changes to the federal community charter rules incorporated into 15-EA-20, Chartering and Field of Membership Manual. We appreciate the opportunity to provide support for the NCUA's efforts to strengthen the federal credit union charter and support a dual chartering structure for credit unions.

During NCUA's review of the field of membership regulations in 2010, we expressed our interest in the regulations being modified to recognize an individual congressional district as a well defined local community. With the most recent proposed rule, we are pleased to see that the federal regulator has matched existing practice by many state regulators to support a statewide community when the state is a single congressional district.

We recognize the demands on the Board and staff of NCUA in drafting these proposed changes and in meeting the many conflicting issues. We ask that the NCUA Board move forward with these proposed rules and not be influenced by those outside of the industry who are not focused, as we are, on providing strong solutions to members' financial needs.

Sincerely,

Margaret O'Donnell
NEFCU Board Secretary
meg.odonnell@uvmhealth.org