The Partnership®
Federal Credit Union

February 3, 2016

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428
regcomments@ncua.gov

Re: Comments on Proposed Rule: 12 CFR Part 701, Chartering and Field of Membership Manual

Dear Mr. Poliquin:

Thank for your consideration regarding our formal comments from (CU Name) on the National Credit Union Administration's ("NCUA") recent proposed rule, 12 CFR Part 701, Chartering and Field of Membership Manual, as published in the Federal Register. We appreciate the opportunity to share our support, and recommendations regarding the Proposed Rule with the Agency.

The Partnership Federal Credit Union is a financial institution which represents 12,500 members across the region.

We commend and are fully supportive of the NCUA's proposed rules but would like to focus in on several areas of particular concern.

Inclusion of Select Employee Group (SEG) Contractors in a Multiple Common Bond and Inclusion of Office or Industrial Park Tenants in A Multiple Common Bond –

Our credit union strongly supports the ability to add contractors of a multiple SEG sponsor and employees of an office building or complex as a separate SEG. We feel this will be especially helpful to credit unions based in Washington Metropolitan Area allowing for greater flexibility in serving those members closely associated with a government agency, which many are. More and more, government agencies are outsourcing functions of their business by bringing in contractors to work with them. As a credit union representing three government agencies (FDIC, US Secret Service and National Science Foundation) and one major government sponsored enterprise (Fannie Mae), we provide services to these employees who work with or for these agencies in a certain location. As these contract employees change over time, it is laborious to consistently have to develop new contacts with companies who have only a few employees deployed in these buildings. It would be extremely helpful to be able to offer consistent services to the employees who work in these buildings.

Exclusion of Non-Depository Institutions and Non-Community Credit Unions when Calculating the Concentration of Facilities Ratio

Our credit union supports the exclusion of non-depository institutions or non-community credit unions from the concentration of facilities ratio test as these institutions by definition or in fact cannot actually serve the proposed area, despite having a branch there.

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

As a credit union with assets of $150M who serves four separate agencies with employees between 1,500 – 8,000, we are well aware of how difficult it would be for one of these groups to form their own credit union that would be productive enough to survive in our current economy. Therefore, our credit union supports this provision that will facilitate the addition of groups that fall within the 3001-5000 member range. It will eliminate the presumption that a group of that size can form a credit union. However, we strongly recommend that the group number be raised to between 5,001 and 10,000, if not eliminated completely.

The overwhelmingly positive rule changes put forth by the NCUA will give credit unions in Maryland and District of Columbia as well as nationally the ability to more fully operate and compete and serve member-consumers in a safe and sound manner and provide competitive products and services to the benefit of their respective members and institutions.

We are fully supportive of the NCUA's proposed rules on FOM and we hope our comments will be respectfully reviewed and considered as the final rules are formulated in the near future.

Thank you for the opportunity to comment on the Proposed Rule. Please do not hesitate to contact me should you have any questions.

Sincerely,

Theresa B Mann

Theresa B. Mann
President/CEO