



February 3, 2016

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

RE: Comments on Notice of Proposed Rulemaking for Field of Membership – RIN: 3133-AE31

Dear Mr. Poliquin,

Please accept this letter of comment relative to the National Credit Union Administration (NCUA) proposed revisions to the Chartering and Field of Membership Manual. I am writing on behalf of Pioneer Valley Federal Credit Union (PVFCU) a Low-Income Designated Credit Union, which serves multiple select employee groups primarily in the Springfield, MA area; to express support for NCUA's proposed field of membership rule.

The proposed regulation is a significant improvement over the current regulation. We appreciate the efforts made by the Working Group in developing this proposal.

Under the current regulations PVFCU is limited to serving only the employees of a particular select employee group. While under the new proposal, PVFCU will have options to increase its field of membership. PVFCU agrees to the proposed rule changes, these changes would allow us to expand our services and foster the financial well-being of the people living in our community.

PVFCU serves a healthcare facility in Western Massachusetts. The healthcare organization works with various contractors, and we agree to the proposed changes of extending the ability to add persons who work regularly for an entity that is under contract to any of the select employee group sponsors listed in its charter. PVFCU requests that you also consider including the students, interns, residents and volunteers of a select employee group.

In addition, we serve employees of a military base and we are in agreement with the changes to include within its common bond the honorably discharged veterans of any branch of the US Armed Forces listed in its charter. Furthermore, we support the changes to the proposed rule which offers a new and appropriate level of streamlined processing procedures for the determination of feasibility groups. The impact of the capacity to expand our field of membership under the new regulations would enhance the ability to serve PVFCU's community.

Thank you for the opportunity to comment on this proposed rule and for considering our views on field of membership. We request NCUA to approve a final rule so that credit unions can take advantage of the regulatory relief and field of membership flexibility in the proposed new rule.

Sincerely,

Anabela P. Grenier
President/CEO
Pioneer Valley Federal Credit Union

cc: CUNA, CCUA