

December 16, 2015

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

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

Dear Gerald Poliquin,

The National Credit Union Administration Board (NCUA) is proposing to amend part 701 of its rules and regulations to make revisions to the agency's chartering and field of membership manual. I am writing on behalf of Charter Oak Federal CU, which serves Eastern Connecticut 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 Charter Oak FCU is limited to serving its metropolitan statistical area, while under the new proposal, Charter Oak will have several options to increase its FOM. The addition of Combined Statistical Areas and Congressional Districts as WDLCs are a significant improvement and frankly, just makes more sense than just an MSA.

The impact of the ability to expand our FOM under the new regs are a blessing for the future. As we approach saturation levels within our current FOM over the next 5-10 years, there is now the ability to continue to grow our credit union for improved member service and safety and soundness. An expanded FOM opens up new strategic paths for credit unions that are safe and sound and want to expand their services to more individuals and businesses.

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

Sincerely,

Brian Orenstein
President/CEO
Charter Oak FCU

cc: CUNA, CCUL