

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

Re: Proposed Rulemaking for Part 701- Chartering and Field of Membership Manual

Dear Mr. Poliquin:

On behalf of the 70,000 members, the board of directors, and 270 team members of 3 Rivers FCU I appreciate the opportunity to submit comments on the National Credit Union Administration's Proposed Rulemaking for Part 701- Chartering and Field of Membership Manual.

3 Rivers celebrated our 80th Anniversary in 2015, and has grown to almost \$800 million in assets. We are a community chartered FCU, however our board approved allowing management to pursue a charter conversion to an Indiana State chartered CU because of the significant advantages there are in that charter choice. We are located in NE Indiana, which by definition of Hoosiers here would be much larger than our current geographic restrictions. We have reached a penetration of approximately 15%, with increased competitive pressures from banks moving into our area and the competitive disadvantage we have with attracting government deposits and business lending it is hard to believe growth can be fiscally achieved without a conversion. This proposal however is a step that will give us pause to our charter conversion.

I support expanding the field of membership (FOM) regulations and proposing modernizing them in ways that provide greater flexibility to credit unions to serve consumers in the communities in which they are located. Specifically, we support the proposal to recognize each single Congressional district as a Single Political Jurisdiction, qualifying each as a WDLC, and therefore eligible for credit union community charter FOM requests. While this does create some challenges when redistricting occurs, we believe NCUA is properly addressing this through the grandfather clause being proposed.

I agree with the proposal to expand the population limits for rural areas from 250,000 to 1,000,000. We also support the proposal allowing for multiple options to identify a given area as rural and the continuation of allowing rural areas to cross state borders. I do not take issue with the proposal to limit the boundaries of a requested rural area that would overlap state boundaries to not exceed the boundaries of the states that are "immediately contiguous" to the state in which the FCU serving the rural district is headquartered.

Thank you for the opportunity to comment on the proposed Chartering and Field of Membership Manual revisions. I am encouraged that NCUA was willing to approach this revision in a way that provides greater flexibility to credit unions wishing to serve a broader FOM than what would currently be allowed. The desire of NCUA to be more flexible and to provide regulatory relief is much appreciated. If you have any questions about our letter, please do not hesitate to give me a call at (260)490-8328, ext 3328.

Sincerely,

Don Cates
President and CEO