



February 5, 2016

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Mr. Gerald Poliquin
Secretary to the NCUA Board
1775 Duke St
Alexandria, VA 22314

Dear Mr. Poliquin:

As President/CEO of Altra Federal Credit Union, a multiple common bond Credit Union based in Onalaska Wisconsin, I am submitting our Credit Union's formal comment to NCUA's recent Field of Membership Proposal.

My first thought is to applaud you for your efforts in Field of Membership Reform. In reading various summaries of the proposed changes, I would say this is a good step in helping Credit Unions in their continued efforts to grow, expand geographically and to provide value added services to more members.

Altra Federal Credit Union supports the following changes:

- I. Streamlined Determination of Stand-Alone Feasibility of Groups Greater than 3,000.
- II. Other Persons Eligible for Credit Union Membership – Adding honorably discharged veterans
- III. Inclusion of Select Employee Group Contractors and Office or Industrial Park Tenants in Multiple Common Bond definition.
- IV. Reasonable Proximity changes that allow for Credit Unions to serve Select Employee Groups through online and mobile solutions.
- V. Exclusion of non-depository institutions and non-community credit unions from the Concentration of Facilities Ratio Test when applying for Underserved Area.

Some recommendations that Altra Federal Credit Union would strongly urge NCUA to consider would include:

- I. Further define Reasonable Proximity to not only assist Credit Unions in adding Select Employee Groups but also in adding Underserved Areas. The same premise used in the proposed FOM changes to benefit Select Employee Group acquisition, serving members via online and mobile, is the same when trying to serve a potential Underserved Area. The requirement to add a physical location within the proposed Underserved Area is perhaps outdated and unduly difficult on Credit Unions due to land, construction and

employee costs and could inhibit the desired expansion and growth NCUA is trying to support with these changes.

- II. Eliminating the Concentration of Facilities Ratio Test altogether. If the financial institutions within the proposed Underserved Area were successfully serving the community then why would it still be listed on CDFI's site as an Underserved Area? This test is flawed as it only measures the number of buildings, it does not measure market penetration, service levels, pricing or the quality of the products and services being offered.

I look forward with optimism that the above recommendations will be reviewed and added to the proposed Field of Membership Changes due out later in 2016. Thanks for your continual efforts in helping Credit Unions grow and prosper and for giving us the opportunity to give feedback on proposals such as this one.

Respectfully Submitted,

A handwritten signature in cursive script that reads "Jack Peplinski".

Jack Peplinski
President/CEO
Altra Federal Credit Union