

February 2, 2016

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

Re: Comments on Notice of Proposed Rulemaking Regarding Chartering and Field of Membership Manual

Dear Secretary Poliquin,

First Technology Federal Credit Union ("First Tech" or "Credit Union") respectfully submits this Commentary in support of the National Credit Union Administration's ("NCUA") proposed rulemaking regarding revisions to the Chartering and Field of Membership Manual as published in the Federal Register on December 10, 2015. As a member of the NCUA's FOM working group, First Tech applauds the efforts of the NCUA's staff and Board in developing a fair and balanced proposal.

In our view, the proposed revisions to the Chartering and Field of Membership Manual serve to substantially improve and clarify NCUA Field of Membership ("FOM") requirements for federal credit unions. Moreover, we believe that the NCUA's utilization of its existing statutory authority to ease undue burdens and restrictions, enhance FOM expansion options, and maximize competitive parity between state and federal credit union charters will provide countless American consumers who have been "left behind" or otherwise denied access to affordably priced banking services to secure high quality services from federal credit unions. In addition, we believe the proposed rulemaking will assist in the improvement of the long-term viability of critically important smaller credit unions by expanding their eligible membership base and allowing these credit unions to secure and maintain the scale and diversification of membership needed to diversify risk and maintain profitable operations.

While much of the proposal focuses on service areas for community credit unions and expansion of single common bond federal credit unions that serve a trade, industry or profession, First Tech appreciates the clarity provided related to the treatment of Select Employee Group ("SEG") contractors. In servicing great American technology companies; such as Intel, HP, HP Enterprises, Microsoft, Amazon, Nike, Cisco, Agilent and others; we are often forced to reject membership requests from security, maintenance and other personnel/contractors working on the SEG's campuses. In addition, the business model of many of our SEG employers has shifted to a "mixed use" staffing model of contractors and full time employees.



Mr. Gerard Poliquin, Secretary of the NCUA Board

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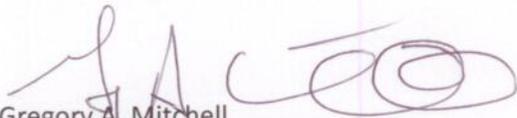
Re: Comment Letter Proposed Rulemaking – Associational Common Bond

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In our view, the NCUA's proposed extension of the single occupational bond rule allowing the service of SEG contractors to multiple common bond charters will aid First Tech in better serving all individuals who share the strong dependency on our SEG employers and are located on their corporate campuses where we maintain a presence.

First Tech appreciates the opportunity to comment on the proposed rulemaking regarding revisions to the Chartering and Field of Membership Manual. Should you have any questions concerning our comments or concerns, please contact me at 650-386-7220.

Respectfully submitted,



Gregory A. Mitchell  
President and Chief Executive Officer  
First Technology Federal Credit Union