



1 South Pinckney Street, Suite 810, Madison, WI 53703-2869
608.258.4400 fax 608.258.4407

145 University Avenue West, Suite 450, St. Paul, MN 55103-2044
651.228.0213 fax 651.228.1184

www.cooperativenetwork.coop

February 2, 2016

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

Re: Comments on Notice of Proposed Rulemaking Regarding Association Common Bond

Dear Mr. Poliquin:

Cooperative Network is an association of more than 400 cooperative businesses owned by residents of Wisconsin and Minnesota. Our diverse membership includes member-owned financial, farm supply, health care, mutual insurance, dairy marketing, consumer, livestock marketing, communications, electric utility, housing, school district, and worker-owned cooperatives, among others. I am writing you on their behalf to express our support for the National Credit Union Administration's (NCUA) proposed revisions to the Chartering and Field of Membership (FOM) Manual.

These proposed revisions would substantially improve FOM requirements for federal credit unions (FCU) by easing undue burdens and restrictions on their ability to provide services to consumers who are eligible for FCU membership. It would also enhance the menu of strategic options for FOM expansion and maximize competitive parity between federal and state charters.

Credit unions have been reliable lenders in urban, suburban, and rural areas in both of our states for decades. The proposed revisions would make it easier for some credit unions to extend service to areas that are presently without access to mainstream financial services. The benefits of these proposed rules, especially those to consumers in financially underserved areas, include:

- Encouraging the formation of a credit union
- Upholding the provisions of the Federal Credit Union Act
- Promoting thrift and credit extension
- Promoting credit union safety and soundness
- Making quality credit union service available to all eligible persons

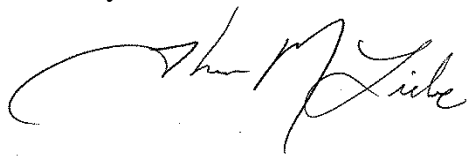
Cooperative Network supports a vibrant dual-charter model in which credit unions can choose whether to exist at the state or federal level based on what makes most sense to the respective member-owners of each institution.

The past several years have witnessed a conversion to state-chartered credit unions at the rate of 4:1. This has been due largely to the FOM flexibility that has been granted by state legislatures. Cooperative Network and our members believe the proposed revisions to the Chartering and Field of Membership Manual will affect almost all credit unions including state-chartered credit unions that will benefit from state parity laws.

Due to the points outlined above and in support of our credit union members and the businesses they serve, the cooperative businesses of Wisconsin and Minnesota respectfully support the NCUA's proposed revisions to the Chartering and Field of Membership Manual.

We thank you in advance for your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Liebe". The signature is fluid and cursive, with a large initial "T" and "L".

Tom Liebe
President & CEO
Cooperative Network

cc: Senator Al Franken
Senator Amy Klobuchar
Representative Michele Bachmann
Representative Keith Ellison
Representative John Kline
Representative Betty McCollum
Representative Richard Nolan
Representative Erik Paulsen
Representative Collin Peterson
Representative Tim Walz

Senator Tammy Baldwin
Senator Ron Johnson
Representative Sean Duffy
Representative Ron Kind
Representative Gwen Moore
Representative Tom Petri
Representative Mark Pocan
Representative Reid Ribble
Representative Paul Ryan
Representative Jim Sensenbrenner