



February 5, 2016

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

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

Dear Mr. Poliquin:

Thank you for the opportunity to comment on The National Credit Union Administration's (NCUA) proposal to amend Part 701 of its Rules and Regulations, making revisions to the chartering and field of membership manual. I am writing on behalf of GFA Federal Credit Union, which serves a number of towns in Worcester and Middlesex Counties in Massachusetts, and Hillsborough and Cheshire Counties in New Hampshire. However, our charter does not include any of the above counties in total. GFA has applied, under the current rules, to expand its field of membership three times since 2012. Each time, the application has been denied. The desire to expand our field of membership was twofold; one to provide for a more contemporary FOM (our current FOM delineates cities and towns) and to remain competitive.

We believe that the proposed regulation is a significant improvement over the current regulation; accordingly, we are writing in support of the proposal. We appreciate the efforts of the Working Group in developing the proposal.

In general, community credit unions, such as GFA, have a competitive disadvantage over both state-chartered credit unions and credit unions with multiple common-bond charters. In our field of membership, three such credit unions exist, two with state charters that have fields of membership that encompass the entire state of Massachusetts, and a federal credit union whose field of membership encompasses the entire country. Further, multiple common-bond credit unions promote broad membership eligibility because of a relationship with a national not-for-profit corporation. Converting to a multiple common-bond charter presents an arduous task. The allowance of well-defined portions of Core-Based Statistical Areas (CBSA) proposed will help alleviate the competitive pressures that our limited field of membership creates.

GFA's existing field of membership is centered in economically depressed areas. The allowance of well-defined portions of CBSA's, as proposed, will allow GFA to serve a more diverse socio-economic environment, enhancing the safe and sound operations of GFA.

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One of the reasons for a previous decline was that we sought to include Cheshire County, New Hampshire in our FOM, as we have a successful branch operating in Rindge, NH. Cheshire County is a rural area not defined in a CBSA. GFA's field of membership includes fewer than five towns in Cheshire County. This area is served by only one small community credit union headquartered in the area. The population of Cheshire County can be better served with GFA's full array of solutions for individuals and small businesses that may not currently have access. The ability to add a contiguous area outside our CBSA, as proposed, would promote the economic advancement of Cheshire County by allowing a member-centric community credit union to serve members there.

Given the multiple attempts to expand our FOM, with no success, we had come to the conclusion that the only option for GFA would be to investigate a different charter option. We are pleased to see the potential opportunity for improvements to the Rules & Regulations and wholeheartedly support its adoption.

Sincerely,

Tina M. Sbrega
President and Chief Executive Officer

cc: CCUA

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