



February 5, 2016

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

Dear Mr. Poliquin,

RE: Comments on Notice of Proposed Rulemaking Regarding Associational Common Bond

I am writing on behalf of Capital Credit Union, a community credit union located in Bismarck, North Dakota serving 30,000 members. Capital Credit Union is a state chartered credit union, so not directly impacted by the proposed changes at this time. We are however, in support of the proposed rule which would amend the FOM rules for federally chartered credit unions. We support the need for the Rule for the very reasons NCUA has proposed it; specifically to enhance the menu of strategic options for FOM expansions. Having the ability to serve as many potential members as possible serves all members well, and strategic growth is critical to all credit unions' survival.

We appreciate and applaud NCUA's willingness to address this issue and look forward to the final rule.

Sincerely,

A handwritten signature in blue ink that reads "Debra M. Gallagher". The signature is fluid and cursive, with a large loop at the end.

Debra M. Gallagher
President/CEO