

February 4, 2016

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

Re: Comments on Proposed Rule:12 CFR Part 701, Chartering and Field of Membership Manual

Dear Mr. Poliquin:

Thank you for the opportunity to comment on the National Credit Union Administration's ("NCUA") recent proposed rule, 12 CFR Part 701, Chartering and Field of Membership Manual Chartering and Field of Membership Manual. The Baltimore County Employees Federal Credit Union appreciates NCUA's commitment to help all credit unions attract new members by providing high quality financial services with reasonable rates, terms and conditions.

We fully support the proposed rule changes and believe the rule changes will help all credit unions, not just the largest, continue to operate in a safe and sound manner. More specifically, we support:

The opportunity for a Community Common Bond credit union to serve a portion of a core-based statistical area without having to serve the core area.

The opportunity for a Community Common Bond credit union to serve a combined statistical area as a well-defined local community (WDLC).

The opportunity for a Community Common Bond credit union to serve a contiguous area outside a core-based statistical area or combined statistical area.

The inclusion of Select Employee Group contractors in a Multiple Common Bond credit union field of membership.

Again, thank you for the opportunity to comment on the proposed rule changes and the ability to offer credit union membership to the millions of Americans who seek affordable financial services.

Sincerely,



David P. Hagar
President