



P.O. Box 1387 • Warsaw, Indiana 46581-1387 • (574) 267-6144

January 27, 2016

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

RE: Comments on notice of Proposed Rulemaking Regarding Association Common Bond

Dear Mr. Poliquin,

As an Ag Banker with Lake City Bank in Warsaw, Indiana, I am very concerned about the impact of further expanding the credit union industry's potential field membership through the proposed rule on Chartering and Field Membership. The provisions of this proposal, when put in place, would provide federal credit unions with the opportunity to increase membership drastically. This increase would allow the credit union industry to greatly increase the already unfair tax subsidy that the credit unions enjoy.

My bank is a community bank and we compete with some very aggressive credit unions in our market place. Two of those credit unions have grown to be some of the largest Ag credit unions in the United States. One of those credit unions, Beacon Credit Union, was allowed to purchase a private, Ag finance company this past year that was paying taxes. Now they aggressively advertise and solicited business to further their membership with the advantage of their tax free status. This is being done under the existing membership rules; the rules of membership do not need to be further eased to allow more unequal competition to community banks.

Thank you and please consider my views on this proposal change.

Sincerely,

A handwritten signature in cursive script that reads "Joseph F. Kessie".

Joseph F. Kessie
Senior Vice President