



February 8, 2016

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

RE: Chartering and Field of Membership Manual (12 CFR Part 701, RIN 3133-AE31)

Dear Mr. Poliquin,

On behalf of Digital Federal Credit Union, thank you for the opportunity to comment on the National Credit Union Administration's (NCUA) proposed rule on the Chartering and Field of Membership (FOM) Manual. Overall, I applaud the NCUA's efforts to modernize regulations to allow credit unions to amend its chartering and field of membership to provide them with greater flexibility in membership eligibility of consumers.

The NCUA's initiative to address FOM reform by incorporating online financial services into the definition of "service facility" is an important revision to FOM regulations. I thank the NCUA for recognizing the impact growth of technology and digital communication platforms have on credit unions and its members. I believe incorporating such change in the final regulation recognizes the technological advancements that is and can be offered to consumers and credit unions.

Additionally, I believe adding those who have been honorably discharged as a veteran of any branch of the U.S. Armed Forces to affinity groups within the proposed rule should be in the NCUA's final FOM regulation. The NCUA recognized the worthiness of such an affinity group and I hope additional affinity groups be considered in the final FOM rule.

I commend the NCUA for reorganizing and streamlining the application process for multiple common bond expansions according to group size. However, I believe the change from 3,000 to 5,000 members is not commensurate to the rising costs and complexity of operating a competitive credit union. Based on the analyses provided within the proposed rule, the 10,000 members consideration appears to be more appropriate for the stand-alone feasibility and the resource burden benefits outlined in the proposed rule. I urge the NCUA to increase the streamlined determination of stand-alone feasibility of groups to be at least 10,000 members.

In closing, thank you once again for this opportunity to comment on the proposed rule on the Chartering and Field of Membership Manual. I look forward to additional communication from the NCUA on providing credit unions with greater flexibility in membership eligibility of consumers.

Sincerely,

A handwritten signature in black ink that reads "Laurie M. LaChapelle".

Laurie M. LaChapelle
Vice President of Finance

