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February 5, 2016

Gerard Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 22314-3428  
Email: regcomments@ncua.gov

RE: Notice of Proposed Rulemaking Regarding Associational Common Bond –  
RIN 3133-AE31

Dear Mr. Poliquin,

Aberdeen Federal Credit Union (FCU) appreciates the opportunity to provide comment to the National Credit Union Administration (NCUA) with regard to the proposed amendments to the Chartering and Field of Membership Manual regarding Associational Common Bond. To provide a brief background, Aberdeen Federal Credit Union is a rural credit union located in Brown County, South Dakota with assets of \$122 million serving 11,010 members. Our membership is a mix of rural agricultural workers along with federal, state, and local employees. We have a long established history of serving our membership in a safe and sound manner.

I applaud the NCUA for taking such positive steps to reduce the unnecessary regulatory burden. We fully support the NCUA's proposed rule to amend the Chartering and Field of Membership Manual and I encourage the NCUA Board to quickly adopt all of the proposed changes

Despite what others in the financial industry may argue, our credit union continues to operate for the same purpose and upon the same beliefs as those credit unions did when the Federal Credit Union Act was signed into law, namely, "Our credit union is a member-owned, democratically operated, not-for-profit organization managed by a volunteer board of directors, with the specified mission of meeting the credit and savings needs of consumers, especially persons of modest means. The purpose of this credit union is to promote thrift among its members by affording them an opportunity to accumulate their savings and to create for them a source of credit for provident or productive purposes."

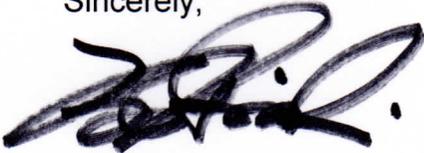
I am aware that Federal and State chartered credit unions have expressed concern that the federal charter is falling behind many state charters and thus has become a barrier to the flexibility needed to operate dynamic and efficient cooperative financial institutions. The number of federally chartered credit unions converting to state charters over the past decade provides even further evidence that the federal charter is oftentimes not as adaptable as state charters. Consequently, NCUA's proposed rule comes at a critical time and need for reform.

I encourage the NCUA to evaluate further the agency's processes for approving FOM expansion. Many credit unions have complained that the FOM expansion applications are onerous. We urge NCUA to develop methods for automatic approval for FOM expansion for all credit unions similar to what NCUA provided in the 2014 associational common bond final rule. For example, if NCUA finalized the use of Congressional districts as a community, then all Congressional districts should be automatically approved for a credit union's FOM. Statistical areas, single political jurisdictions (SPJs), and rural districts also should get automatic approval.

We believe that everyone should have the opportunity to be a member-owner of a credit union. This proposed rule will maximize access by removing undue burdens and restrictions on a Federal Credit Union's ability to provide services to consumers who are eligible for FCU membership, particularly those of modest means and those who may not currently be members of a credit union.

Thank you for the opportunity to share our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Goscicki', with a stylized flourish at the end.

Robert J. Goscicki  
President/CEO  
Aberdeen Federal Credit Union  
Charter #274

cc: Board of Directors – Aberdeen FCU