

January 14, 2016

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

JAN21'16 PM 1:32 BOARD

Dear Mr. Poliquin:

On behalf of Desco Federal Credit Union, I am writing to you regarding the National Credit Union Administration's (NCUA) proposed rule amending the Chartering and Field of Membership (FOM) Manual, incorporated as Appendix B to part 701. I appreciate NCUA's initiative in this rulemaking to provide meaningful regulatory relief to credit unions and welcome the opportunity to provide comments on this proposal.

Of particular interest to the Board and management of Desco is the proposal that would permit the addition of adjacent areas to community charters that serve small metropolitan statistical areas. Desco is headquartered in Portsmouth, Ohio, and serves five counties in a sparsely populated, low income area in Appalachia. The communities adjacent to our existing charter area have limited financial institution options and present an opportunity for Desco to expand and offer additional choices if the proposed FOM changes are made.

Thank you very much for the opportunity to comment on the proposed regulation. I applaud the agency's willingness to amend the Chartering and FOM Manual to provide much needed relief for the credit union industry.

Sincerely,



R. Lee Powell, Jr.  
President/CEO  
Desco Federal Credit Union