

April 24, 2015

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

RE: Comments on Proposed Rule 791 and IRPS 15-1

Dear Gerald Poliquin,

I am writing on behalf of the West Orange Municipal FCU, which serves multiple employers and associations in Essex County, NJ. We have 1,200 Members and \$6.9 million in assets. West Orange Municipal FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the small entity definition.

We support the proposal that would amend NCUA's definition of small entity for Regulatory Flexibility Act analysis by increasing the asset threshold from \$50 million to \$100 million. In fact we would propose that this threshold be increased to \$550 million to be in line with that set by the FDIC.

While endorsing a \$550 million asset threshold in relation to regulatory flexibility the threshold related to OSCUII services is really a very different matter. Right now the office seems to be stretched to its limits in attempting to serve credit unions up to \$50 million. OSCUII has great programs and we have participated in two EDS consultations in the last three years but to expand their services to more credit unions will require an infusion of funds as well as personnel. I would endorse OSCUII services being made available to credit unions up to \$250 million in assets because quite frankly in the world of financial services that is still a small financial institution.

Credit unions need the ability to expand to obtain improved economies of scale and the ability to provide the services today's consumers are looking for. Small credit unions have special needs to gain access to analytical and business and strategic planning resources in order to grow in a smart way. OSCUII can play a significant role in providing this assistance but only with adequate appropriations.

I hope the NCUA will enact the regulatory flexibility analysis provision as recommended here and then consider the OSCUII threshold as a separate decision. This would be in the best interest of credit unions and the agency.

Thank you for the opportunity to comment on this Proposed Rule and for considering our views on the proposed amendment.

Sincerely,

Sandra Mullins
President/CEO
West Orange Municipal FCU

cc: CUNA, CCUL