

November 17, 2016

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

Re: 2<sup>nd</sup> proposed Field of Membership rule

Dear Mr. Poliquin

I am writing on behalf of NorthCountry Federal Credit Union regarding the 2<sup>nd</sup> Field of Membership issued in 2016. The NCUA Board and staff deserve significant credit in attempting to modernize the Field of Membership regulations for federally chartered credit unions and increase the relative value of the federal charter. We believe all changes in the 2<sup>nd</sup> rule are allowed within the Federal Credit Union Act and should be adopted without revision. Specifically, we support the following changes:

- The proposed rule gives federally chartered credit unions the ability to submit a narrative addressing thirteen criteria in lieu of a presumed community will allow credit unions to make a documented case that a proposed field of membership does in fact represent a well-defined local community of common interests among its residents.
- The proposed rule would increase to 10 million the current (and retained in the final rule approved by the NCUA Board in October) 2.5 million population limit that presently applies to a community consisting of a CBSA or Combined Statistical Area or other area a FCU designates, subject to a FCU's ability and commitment to adequately serve the area. This change will expand credit unions that exist in large metropolitan areas to amend their field of membership to better serve the community located within densely populated urban areas.
- The proposed rule permits a FCU to Designate a Portion of the Area as its Community Without Regard to Division Boundaries. This corrects the unnecessary discrepancy between the Core Based Statistical Area and the Combined Statistical Area.

Thank you for taking the time to consider this comment letter and we look forward to seeing this proposal become a final rule.

Sincerely,



Bob Morgan

Chief Executive Officer