



November 30, 2016

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

Re: Comments on Notice of Proposed Rulemaking Chartering and Field of Membership – RIN 3133-AE31

Dear Mr. Poliquin:

Dover Federal Credit Union appreciates the opportunity to submit comments regarding the National Credit Union Administration (NCUA) Board's proposed changes to its chartering and field of membership (FOM) rules. Dover Federal Credit Union is based in Dover, Delaware and has 46,840 members and assets of \$455 million. Furthermore, the changes made to the Field of Membership regulations made at the October Board meeting.

A. General Applicability of Narrative Model to Establish a Well-Defined Local Community

The reinstatement of the narrative approach is much needed and appreciated. There are times when a community cannot be defined by a statistical area or political jurisdiction. The narrative approach provides an opportunity for a petitioning credit union to state their case for their market community as makes business sense to that credit union. The criteria identified to substantiate a WDLC is comprehensive and meaningful.

B. Increase in Statistical Area Population Limit to 10 Million

This increase is needed in high density areas as there are multiple WDLCs with populations in excess of 10 million.

C. Portion of CBSA as a Well-Defined Local Community Regardless of Internal Boundaries

This is another common sense improvement that creates consistency among current NCUA regulations and flexibility for credit unions to serve their local market, even if it is smaller than the CBSA or portions therein.

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Again, thank you for this opportunity to comment on the proposed regulation. Please contact me if you have any questions.

Sincerely,

David Clendaniel

David W. Clendaniel
Director of Advocacy

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