

Mid-Minnesota Federal Credit Union

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December 9, 2016

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

RE: RIN 3133-AE31; Chartering and Field of Membership Manual – Community Common Bond

Dear Mr. Poliquin:

Mid-Minnesota Federal Credit Union (MMFCU) appreciates the opportunity to comment on NCUA's proposed changes to the Chartering and Field of Membership Manual as it relates to Community Common Bonds. MMFCU, with assets exceeding \$314 million, is a full service credit union serving approximately 39,000 members in nine rural counties in Central Minnesota. MMFCU is a significant financial services provider in the communities that we serve.

We have had the opportunity to review the comment letters from the Credit Union National Association and the National Association of Federal Credit Unions, and MMFCU is in complete support of the positions and rationale of these two organizations.

MMFCU fully supports the proposed changes to the Chartering and Field of Membership Manual as it relates to Community Common Bonds. Allowing credit unions to use a narrative model just makes sense as many communities are not defined by political subdivisions or statistical areas. Often one must look at other factors that tie a community together.

MMFCU also fully supports the raising of the population limit from 2.5 million to 10 million as a Well-Defined Local Community (WDLC) for Metropolitan Statistical Areas (MSAs). While large populations may seem not connected, people who live in large metropolitan areas often connect to the larger city as well as their neighborhood.

MMFCU again thanks the NCUA Board for the opportunity to comment on the proposed rule and appreciates that the NCUA Board has again used a common sense approach toward this area of regulation.

Sincerely,



Douglas C. Wolf
Executive Vice President/CFO

Copy: MMFCU Board
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