

July 28, 2017

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

Dear Mr. Poliquin,

Thank you for the opportunity to provide comment on the proposed rule changes for "Voluntary Mergers of Federally Insured Credit Unions."

Sound Credit Union is a \$1.4 billion credit union in the State of Washington. Our credit union has merged with 16 other credit unions during our 77 years of existence. We have seen the benefits of mergers for our collective members. Our commitment has been to help other credit unions who see the need to merge to better serve their members. As the financial services world around us continues to change so rapidly, there will be opportunities for credit unions to join forces to better serve their collective members.

While we see many changes in the proposed rule that add value to the process, there is one proposed rule that doesn't seem to add value based on what we've seen during our previous 16 mergers. This has to do with the "Member to Member Communication". We do not see how this new change would have added significant value in all of our previous mergers. With all mergers, we hold a special meeting where members from the merging credit union can attend and bring up concerns and questions to the credit union board and management. We have seen questions being asked, concerns being voiced, and other useful comments during these meetings. I would respectfully ask, "What problem is the NCUA trying to solve with this part of the new regulation?" Every member has the opportunity to voice any concern in front of any interested member during the special meeting. The reality is that most members during our mergers understood the need to merge. They mostly want to make sure that their balances are correct and that the services offered are efficient, current, and accurate. "Member to Member Communication" seems to be overkill as to what is already happening during the special meeting.

Mergers are important to the financial strength and longevity of the credit union system. We urge you to not consider incorporating any language within the proposed rule (i.e. Member to Member Communication) that adds limited value and may slow down or even stall a merger of two willing credit unions. Thank you again for the opportunity to share with you, based on our experience with many mergers, our thoughts regarding this new regulation.

Sincerely,



Don L. Clark Jr.  
President/CEO  
Sound Credit Union