

From: [R. Richard Larke](#)
To: [Regulatory Comments](#)
Subject: Support of NCUA Proposed Changes to Field of Membership Rules
Date: Monday, January 11, 2016 10:30:12 AM

Dear Secretary of the Board Poliquin,

Seasons Federal Credit Union is a \$156 million community credit union with branches in Middletown, Cromwell and Meriden Connecticut. We have been in business for over 80 years. I am in strong support of the proposed changes the National Credit Union Administration (NCUA) has made to the Chartering and Field of Membership rules.

We started as a teacher's credit union and experienced great success under that Charter. However, competition grew exponentially in our community and in order for my credit union to continue to prosper, we needed to be able to serve a wider range of consumers. We were approved for a Community Charter serving all of Middlesex County in 2000. A second expansion was approved in 2004, which added 9 towns in a neighboring New Haven County.

We have been unable to expand our membership further into New Haven County because it is not in the same Core Based Statistical Area (CBSA) as Middlesex County. Though we 60% of the county is in our Field of Membership and we have a branch in this county, our hands have been tied when it came to adding the county as a whole, until now.

If the proposed rule changes are adopted, Seasons Federal Credit Union can go back to NCUA and ask to add New Haven County, an area adjacent to our CBSA, to our field of membership. Please finalize the rule as soon as possible. It will allow my credit union to seek an expansion that has made sense for years.

Sincerely,

R. Richard Larke
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