

April 13, 2007

Ms. Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314-3428

Re: Proposed Rule – Records Preservation Program and Appendices – Record retention Guidelines; Catastrophic Acts Preparedness Guidelines

Dear Ms. Rupp and Members of the NCUA Board:

I am writing on behalf of the Board of Directors and management team of Visions Federal Credit Union which is headquartered in Endicott, New York and serves 112,000 members in southern New York and northern Pennsylvania.

Part 748

I would suggest that the words “**three complete business days**” be substituted for “**...more than two business days**” and that “**vital member services**” be defined. This is important so that a credit union with multiple offices in a large service area does not inadvertently fail to comply with the regulation because, for example, it has closed one branch for a day and a half because of snow or an ATM is disabled. I believe the purpose of your change in regulation is to define what constitutes a catastrophic problem that requires reporting.

Part 749

749.1

We are in agreement with the requirement that share, deposit and loan balances be available as of the most recent business day and paragraph (d) that would require credit unions to maintain emergency contact information.

749.3

We are also in agreement with the additional phrase that states a back-up site may be another Federally Insured credit union and the need to have the software and hardware necessary to access the records at the vital records center.

Appendix B to Part 749

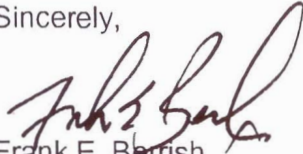
Letter 01-CU-21, 06-Risk-01 and other guidance already require that credit unions have comprehensive Disaster Recovery and Business Continuity plans that would cover all the areas detailed in this new section that states it is a “suggested guideline” for preparing for catastrophic acts. A comprehensive and integrated regulation that incorporates the requirements of the letters referred to as well as other published letters would be more appropriate than this



proposed Appendix and would offer credit unions clearer guidance as to NCUA's expectations in this area.

We appreciate the opportunity to comment on the proposed rule.

Sincerely,

A handwritten signature in dark ink, appearing to read "Frank E. Berrish". The signature is fluid and cursive, with a large initial "F" and "B".

Frank E. Berrish
President/ CEO

FEB/Dmc/2007 NCUA Response Records Preservation

cc: NAFCU