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May 11, 2007

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

Re: Proposed Changes to Records Preservation Program and Appendices

Dear Ms. Rupp,

The Georgia Credit Union League (GCUL) appreciates the opportunity to comment on the proposed amendments to Parts 748 and 749 of NCUA's regulations that address a federally insured credit union's obligation to maintain a records preservation program. The proposed rule draws from existing guidance to clarify requirements for preserving vital records and to suggest important items for consideration in restoring vital member services. As a matter of background, GCUL is the state trade association and one member of the network of state leagues that make up the Credit Union National Association (CUNA). GCUL serves approximately 185 credit unions that have over 1.7 million members. This letter reflects the views of our Regulatory Response Committee, which has been appointed by the GCUL Board to provide input into proposed regulations such as this.

GCUL supports the Agency's efforts to review and clarify the issues surrounding the interruption and resumption of service to credit union members and access to vital information in the wake of a catastrophic occurrence. In particular, we submit the following comments for consideration:

Part 748 – Report of Catastrophic Act

The Board proposes to revise the definition of "catastrophic act" to clarify that any event causing an interruption in vital member services for more than two business days is a qualifying event. We generally support this definition, but would encourage the Board to clarify the definition as two complete business days.

Part 749 – Records Preservation Program and Catastrophic Act Preparedness Guidelines

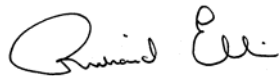
Section 749.1 includes changes to the vital records definition in order to clarify that share, deposit, and loan balances for each member's account should be available as of the most recent business day, while a financial report of the credit union's asset and liability accounts and bank reconcilements should be available as of the most recent month's end. All other vital records should be updated as changes occur. We agree with this change.

We appreciate and agree with the clarification in Part 749 that states a back-up site may be another Federally Insured credit union. Many credit unions look to their peers for backup sites and enter into reciprocal arrangements with one another. The clarification from NCUA in this section provides assurance that this method of preparation is sufficient.

Regarding the creation of a new Appendix B establishing guidelines for catastrophic act preparedness, the Agency has noted in the Proposal that several resources currently exist for disaster preparedness that could also apply for catastrophic acts. While we believe some would see this existing list of resources as sufficient, we support the creation of a new Appendix B that would allow for a single source of guidance for catastrophic acts.

Thank you for the opportunity to comment on the proposed changes to Parts 748 and 749. If you have questions about our comments, please contact Cynthia Connelly or me at (770) 476-9625.

Respectfully submitted,



Richard Ellis
Vice President/Credit Union Development
Georgia Credit Union League