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May 11, 2007

Mary Rupp  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria VA 22314  
VIA FACSIMILE: (703) 518-6319

Re: Comments on Proposed Changes to Part 748 and Part 749

The North Carolina Credit Union League (NCCUL) appreciates the opportunity to comment on the National Credit Union Administration's request for comments regarding clarification of the obligation of federally insured credit unions to maintain a records preservation program. In reviewing the proposal we offer comments in the following specific areas:

Part 748

We agree with the importance of revising the definition of "catastrophic act" to now include a definition of interruption to vital member services. The definition of two (2) business days is appropriate, however we would ask NCUA to clarify the method of communication a credit union should follow to notify NCUA of a catastrophic act. Also we would ask that NCUA include the appropriate notification channel for state chartered federally insured credit unions.

Appendix B Part 749

NCUA has asked whether it is useful or helpful for credit unions to have Catastrophic Act Preparedness Guidelines in the form of a new appendix. We feel that NCUA currently offers valuable and adequate guidance for credit unions to prepare for a disaster or catastrophic event. We do not believe that it is necessary to include a new appendix to address this matter, based on the level of regulatory guidance that is currently available to credit unions from NCUA.

The North Carolina Credit Union League appreciates this opportunity to share the views of North Carolina's credit unions on the proposal.

Respectfully submitted,

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