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Patrick H. Volpe – Chairman
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Visions Federal Credit Union

February 18, 2006

Ms. Mary Rupp, Secretary
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Dear Madam:

I am writing in regard to the current challenge to the ability of Community Chartered Credit Unions to reach out and serve the underserved beyond their core service area.

My perspective on the issue of "Serving the Underserved" spans forty seven years as a credit union member. In 1964 I got involved as an official when I was elected as the Treasurer of a small credit union (W.H. Nichols EFCU) in Massachusetts. It was a time when the banking industry looked quite differently than it does today, when the underserved was the general population. The need for banking services for the common man was quite different and banking offered little to fill this need.

Over my tenure of service I have seen countless examples of how the credit union industry has "forced" the banking industry to liberalize their offerings. They generally respond when threatened by competition. The liberalization of their policies means they must accept lower profits. This pressure drives the current challenge to our existence and desire to serve those who they do not serve.

Over the years, as credit unions have matured and grown more sophisticated, I have seen an increasing momentum by credit unions to more fully serve those of more modest means. I fear that should the NCUA retrench from its encouragement of this direction, we will become just another money store. The "People Helping People" spirit of the movement is at stake. Our record of service to the underserved within our current membership area is well known and respected. We have the resources and desire to do more for our neighbors, be they next door or in the next county.

I ask that you change the current course of restraint and seek new directions which will help and not hinder credit unions from living up to their potential to help the underserved by "People Helping People". Please help us to do that by continuing to allow underserved expansions for Community Chartered Credit Unions.

Sincerely,



Patrick H. Volpe, Chairman

"People Helping People"