

Monument Area Federal Credit Union

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-June 18, 2007

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

Re: NCUA Proposed Changes to 12 CFR Part 701 -Chartering and Field of Membership for Federal Credit Unions

Dear Ms. Rupp:

The Board of Directors of Monument Area Federal Credit Union is pleased to offer the following comments to the proposed changes to 12 CFR Part 701 - Chartering and Field of Membership for Federal Credit Unions.

While we have reviewed the proposal in its entirety, our comments are specific to the Board's request for comments on the current rules dictating mergers between community credit unions. We strongly support the NCUA Board's efforts in seeking public comment on voluntary mergers relative to community chartered credit unions.

Our own experience in this regard has lead us to conclude that the current rules do not work and leave community charters with very little in the way of voluntary merger options. Community chartered credit unions are significantly disadvantaged when evaluating potential merger opportunities. The present rules have been implemented in such a way as to prohibit a voluntary merger between a community chartered credit union and a multiple common bond credit union if the multiple common bond credit union is outside of its community. In our view, this interpretation severely restricts the ability of a community credit union to engage in voluntary merger discussions with its best potential merger partners from a financial and member service perspective.

Provided that a proposed merger is in the best interests of the membership and is consistent with the strategic goals and objectives of the merging institutions,

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We are of the strong opinion that community chartered credit unions should be permitted to enter into a voluntary merger with any single sponsor, multiple common bond credit union or other community charter credit union within its service area. Likewise, should a community chartered credit union voluntarily desire to merge into a single sponsor credit union, multiple common bond credit union or another community chartered credit union, the decision should be based upon what is in the best interest of the member and the ongoing financial stability of the continuing credit union and not the field of membership of the institutions.

Again, thank you for the opportunity to express our thoughts and concerns about the proposed changes to the NCUA Field of Membership rules.

Sincerely,



Cynthia Hawk

Monument Area Federal Credit Union

cc: Chairman Johnson
Vice-Chairman Hood
Board Member Hyland