

To: National Credit Union Administration Board
Attn: Mary F. Rupp, Secretary to the NCUA Board

Subj: Hardin FCU Comments on Proposed Rule IRPS 07-1

Date: June 5, 2007

Thank you for the opportunity to comment on the proposed community chartering rule change. NCUA should be applauded in changing this rule to reflect changes in the community-chartering environment.

As Board President of a farming area community-chartered federal credit union, I feel compelled to address the issue of the proposed definition of a "rural district" as cited in Section V.A. 2. When excluding Micro Statistical Areas from inclusion in the proposed definition of rural districts, it appears to conflict with the USDA's interpretation that allows them. Furthermore, there are MicroSAs in my home state of Ohio alone that have populations well under 100 thousand and sparsely populated. Therefore excluding Micro areas from the definition of a rural district appears unreasonable and inconsistent.

Additionally, it would seem also practical to allow rural districts to include Micro Statistical Areas as well as the surrounding political jurisdictions, if close in proximity, and if the aggregate populations are under 100 thousand and the density of population are fewer than 100 persons per square mile.

If the credit union is to pay the cost to publish in the Federal Register, then I do not support the proposed notice. The only other option would be to require publication in a local newspaper where the credit union could negotiate a more fair price while still providing meaningful notice to the community.

Thank you for considering my concerns.

Douglas B. Clark, Board President
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