

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

Subj: Logan Community Federal CU on Proposed Rule IRPS 07-1

Date: June 6, 2007

I wish to provide comments on this proposed rule involving community chartered credit unions.

I am the Chief Executive Officer of a community-chartered federal credit union located in an Ohio county designated as a Micro Statistical Area. Our county is notably a farming community in a predominantly rural area. Strangely, IRPS 07-1 disallows our county from being considered a "rural district" as cited in Chapter 2, Section V.A. 2. This is unfair since it may affect our ability to expand our present community chartering boundaries in the future.

Additionally, the USDA's interpretation of Micro Statistical Areas includes them as rural districts. Furthermore, a Micro Statistical Area, as a rural district, should be permitted to expand to surrounding counties, if other factors, such as population and density limitations, exist.

Thank you for your attention to our concerns.

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