



July 19, 2007

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

Re: Notice of Proposed Rule 12 CFR Part 701 – Chartering and Field of Membership for Federal Credit Unions

Dear Ms. Rupp and Members of the NCUA Board:

This letter is on behalf of Park Community Federal Credit Union and the 48,000 members we serve. We are a community chartered federal credit union also serving various underserved areas, with our main office located in Louisville, Kentucky.

Park firmly believes that credit union membership should be afforded to as many individuals as possible and that our laws and regulations should support such. We should enhance the ability of credit unions to obtain community charters in order to serve more members. More bureaucracy and red tape in order to serve more members is only a detriment to those potential members. As an industry (movement), we should find ways to encourage credit unions, especially smaller ones, to increase membership. The anemic membership growth in credit unions over the past few years should be a wake-up call to the industry that we should encourage new membership and decrease the regulatory burden.

**Specifically in regard to Section 7 of the proposed rule**, which addresses the limitations of community charter mergers, you state “NCUA is unaware of any particular problems in this merger context.” This is a significant issue when a community chartered credit union considers a merger with a single sponsor, multiple common bond credit union or another community credit union without the same exact defined community. Most importantly, if a single sponsor or multiple common bond credit union merges into a community credit union, there are situations whereby some SEGs may be outside of the defined community and therefore could not be served by the combined credit unions. This results in a disservice to these potential members. Also, it makes the process more difficult and puts a community chartered credit union at a competitive disadvantage to discuss a merger option with another credit union. Many times, these mergers are in the best interest of all members.

To Us, It's *Personal.*

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As you are aware, NCUA, in an emergency situation, will allow a community credit union to add the field of membership of another credit union, with the thought that it is in the best interest of members of both credit unions. I ask, why would that not also hold true in the same voluntary merger situation? At a minimum, it assists in the safety and soundness of both credit unions, in addition to being a benefit to all of the members.

We firmly believe that community chartered credit unions are at a significant disadvantage when a voluntary merger situation may be in the overall best interest of two credit unions. By making the rules less restrictive and allowing combined fields of membership with mergers involving community chartered credit unions, the credit union industry as a whole will become stronger. We believe that voluntary mergers between any combination of either community, single sponsor or multiple common bond credit unions should encompass the combined fields of membership.

Your consideration and assistance in helping to making this a level playing field are appreciated. Thank you for allowing us to comment on the proposed changes to the Chartering and Field of Membership of Federal Credit Unions.

Sincerely,



Dan Oliva  
President/CEO  
Mark Community FCU