

July 24, 2007

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

Re: National Credit Union Administration; Chartering and Field of Membership
For Federal Credit Unions; 12 CFR Part 701; 72 Federal Register 30988, June
5, 2007

Dear Ms. Rupp:

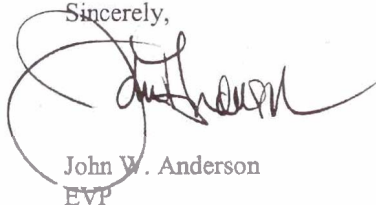
On behalf of the New Mexico Bankers Association ("NMBA"), I am responding to the proposed rule published by the National Credit Union Administration ("NCUA") that would amend NCUA's Chartering and Field of Membership Manual ("Chartering Manual").

The NMBA strongly objects to the modifications to the Chartering Manual that would treat Statistical Areas and Rural Districts as presumptive local well-defined communities. This proposed definition would extend fields of membership far beyond those allowed by law or envisioned by Congress in the creation of credit unions as special purpose cooperatives united by a genuine common bond. Additionally, the NMBA believes that the NCUA board should revisit its policy that a single political jurisdiction, regardless of population size, can be legally deemed a well-defined local community.

The NMBA strongly objects to the idea of treating statistical areas and rural districts as presumptively local well-defined communities as proposed by this rule. NCUA's proposed rule- which significantly expands the definition of community beyond any reasonable definition of "local"- circumvents Congressional intent as expressed in the Credit Union Membership Access Act ("CUMAA") and goes beyond NCUA's underlying statutory authority for chartering and establishing field of membership requirement for federal credit unions. The proposed rule ignores CUMAA's mandate to limit the field of membership boundaries of federal credit unions to "a meaningful affinity and bond among members in the context of shared and related work experiences, interest, or activities, the commonality of routine interactions, and a well-understood sense of cohesion or identity."

For the reasons stated, the NMBA urges NCUA to withdraw the proposed modifications to its community charter regulation.

Sincerely,



John W. Anderson
EVP

Cc: Rick Wadley
Ron Wisser