

**Jordan, Sheron**

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**From:** \_Regulatory Comments  
**Sent:** Monday, July 30, 2007 8:14 AM  
**To:** Jordan, Sheron  
**Subject:** FW: Comments on Proposed Regulations

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**From:** John McKittrick [mailto:JMcKittrick@ornlfcu.com]  
**Sent:** Friday, July 27, 2007 10:39 AM  
**To:** \_Regulatory Comments  
**Subject:** Comments on Proposed Regulations

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

RE Notice of Proposed Rule 12CFR Part 701 Chartering and Field of Membership for Federal Credit Unions.

Dear Ms. Rupp and Board Members:

I appreciate the opportunity to comment on these proposed changes. I believe the changes improve and clarify chartering especially for community based applications. I also believe it will benefit greatly Congress' intention to enable access to credit union services to more of America's citizens.

As to the following provision on merger rules I would ask your consideration for change to allow the continuation of service to any credit union's field of membership who merged with a dissimilar type of charter. This whether voluntary or involuntary. It seems the proposed regulation is significantly out of context with the intent of the Credit Union Membership Access Act. In essence you are curtailing access to member service by arbitrarily lopping off available service to a group of potential members with out providing them recourse to acquire such services through another provider credit union.

"Groups within the merging credit union's field of membership located outside of the community boundaries may not continue to be served. The merging credit union must notify groups that will be removed from the field of membership as a result of the merger. However, the credit union may continue to serve members of record."

Thank you for the opportunity to comment.

John McKittrick, President  
ORNL Federal Credit Union  
P.O. Box 365  
Oak Ridge Tennessee 37830

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