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July 2, 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:

I am writing on behalf of the board of directors and management team of Visions Federal Credit Union, a community chartered credit union with several underserved community additions. We are headquartered in Endicott, New York and serve 117,000 members in southern New York and northern Pennsylvania.

We would like to comment on specific sections of the proposed regulation:

Section 1.b, Section 2, and Section 3

We are in agreement with your proposal that Core Based Statistical Areas (CBSA's) be added with qualifications for use in defining a local community. Overall, it makes sense that use of statistical definitions in the chartering manual at the federal credit union level will help minimize ambiguity and strengthen the federal charter.

We do believe that the agency could improve the regulations by simply allowing the definition of community to include any of the OMB's Metropolitan and Micropolitan statistical areas ***without qualification or narratives***. This would avoid the need for the proposed rule for public notice and comment (Section 2) where there is any question about the legitimacy of the claim of defining a local community. The need for a narrative could also be eliminated for large charter applications if the OMB areas were fully adopted.

Section 4

We understand the desire to set a five year limitation on previously approved geographic areas where there may be rapid growth in large cities and counties with populations in the millions, but believe that in more rural parts of the country such as southern New York, a ten year limitation would be more appropriate since we are not subject to as rapid a population shift and growth.

