

August 14, 2007

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

AUG15'07 AM 9:48 BOARD

RE: Proposed Rule IRPS 07-1

Dear Ms. Rupp:

We appreciate the fact that the NCUA Board is having its Staff review and revise its Chartering Manual with regard to expanding the definition of a 'presumptive local community' to include multiple political jurisdictions. This will allow credit unions a simplified application process to pursue a community charter and also meet the local community definition.

Since NCUA has access to several Federal Agencies, which offer definitions of local communities, they should be able to rely on this information. The Office of Budget and Management information, based on the U. S. Census, provides data and commuting patterns and is a reliable source to support that Core Based Statistical Areas are local communities.

We realize that NCUA is trying to prevent lawsuits, but by posting a public notice on some charters, it appears they are indicating they aren't sure the criteria is being met. NCUA has sole jurisdiction in granting community charters for federal credit unions, and we believe opening applications to comment allows other financial institutions to possibly influence decisions which should be made only by NCUA.

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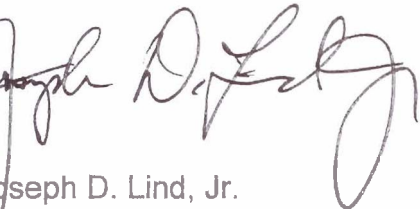
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We are hopeful that the NCUA Board and Staff will simplify the procedure necessary for credit unions to move from a federal charter to a community charter, and it not be necessary to invite public comment.

Sincerely



Joseph D. Lind, Jr.
Chief Executive Officer