

Jordan, Sheron

From: _Regulatory Comments
Sent: Friday, August 03, 2007 8:59 AM
To: Jordan, Sheron
Subject: FW: Comments on Proposed Rule IRPS 07-1

From: Jeff DeBree [mailto:jdebree@penneastfcu.org]
Sent: Thursday, August 02, 2007 11:06 AM
To: _Regulatory Comments
Subject: Comments on Proposed Rule IRPS 07-1

Dear NCUA:

I generally support your proposed rule IRPS 07-1 and the changes you wish to make to the Chartering Manual. The intent of establishing "presumed" well-defined local communities should make it easier for credit unions to determine actions they may be able to successfully take and reduce the number of banker lawsuits involving credit unions and the NCUA both.

However, I would like to point out that the requirement that the dominant city, county, or equivalent contains at least one-third of the CBSA's population may have an un-intended consequence in our area. The Scranton-Wilkes Barre MSA is defined as a single MSA and functions as a single metropolitan area, yet Scranton and Wilkes Barre are two separate cities in two separate counties, neither of which would be able to meet the one third requirement.

Even with that reservation, I support the changes you are proposing to the chartering manual.

Jeff DeBree, CEO