



July 31, 2007

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

RE: Comments Opposing Proposed Rule IRPS 07-1

Dear Ms Rupp:

The Ohio Bankers League [“OBL”] is a non-profit trade association that represents the interests of Ohio’s commercial banks, savings banks, savings associations and their holding companies. The OBL has nearly 230 members that include the full spectrum of the financial services industry, including small mutually-owned savings associations that are very similar in structure to credit unions. Our membership also includes locally owned and operated businesses and large multistate holding companies that have several affiliates and do business from coast to coast. One characteristic that all our members share however is that they are working hard and competing in the marketplace everyday to serve the same customers that credit unions also wish to serve.

The OBL respectfully opposes the NCUA proposal to that would presume that core based statistical areas are local, well-defined communities. This interpretation is contrary to the requirements of the United States Code, and is an unwarranted expansion of marketing areas for community credit unions.

When Congress amended the Federal Credit Union Act to limit community credit unions to a “*well-defined local community*”, it was not done with an intention to expand the geographic reach of credit unions. Credit unions are provided several advantages so they can better serve people of modest means, but those advantages are tied to limitations. One of those limitations is this restraint on the size and scope of the area served by community credit unions. This proposal would erase that local requirement from federal law, which is beyond the authority of the NCUA.

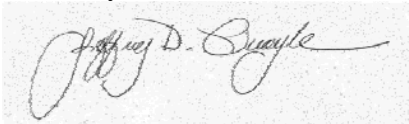
This proposed revision would *assume* that certain core based statistical areas (or “CBSAs”) automatically meet the legal definition of a well defined local community. Unfortunately, a CBSA is neither well-defined nor local: it is merely a statistical tool used by the Federal Office of Budget and Management for analytical purposes. Because it is simply an analytical tool used by federal officials, CBSA boundaries can and do change all the time. Unlike political boundaries, these flexible CBSA boundaries are definitely not “well-defined” as required by federal law.

OBM in fact specifically cautions that these definitions should *not* be used to implement government policies or programs without a full consideration of the effects of using those definitions for such purposes. Thus, using a CBSA as the basis for creating new rights and privileges for community credit unions is an inappropriate use of census data in the eyes of the agency that created these statistical areas. It is even a further departure from federal policy to use a CBSA as a *presumption* to expand the authority and rights of community credit unions. Limiting this presumption to those CBSAs that contain a dominant city that is not a Metropolitan Division, but contains more than 50% of the jobs and 1/3 of the total population can in no way save your proposal. CSBAs only analyze the relationship of outlying areas to that central population center. These statistical tools do not even address the interaction between the outlying counties or areas. The Federal courts have already ruled that the NCUA cannot ignore the relationship between these outlying areas in defining what qualifies as a well-defined local community.

Finally, as noted above core based statistical areas are defined by only commuting patterns with a central core metropolitan area. While commuting patterns are certainly one factor to consider in defining a local community, there are many other factors that can and need to be reviewed. If your member manual is revised as you propose, consideration of these other important factors will be artificially cut off.

For all of these reasons, the Ohio Bankers League opposes Rule IRPS 07-1, and respectfully requests that you withdraw the proposed revision to your member manual.

Sincerely;

A handwritten signature in cursive script, reading "Jeffrey D. Quayle", is written over a light-colored rectangular background.

Jeffrey D. Quayle
Senior Vice President & General Counsel