

August 6, 2007

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

Re: NCUA Proposed Changes to 12 CFR Part 701 – Chartering and Field of Membership for Federal Credit Unions

Dear Ms. Rupp,

On behalf of the management and Board of Directors of Cedar Point Federal Credit Union, please accept these official comments for the record on the National Credit Union Administration's proposal to amend Section 12 CFR Part 701 on Chartering and Field of Membership.

Our credit union, CPFUCU, is located in an area known as Southern Maryland, which is comprised of St. Mary's, Charles and Calvert counties, and a predominantly rural area.

In the near future, we will be applying to the National Credit Union Administration to convert our charter to become a "community" credit union, servicing all three counties. Therefore, we would like NCUA to consider our request for a community charter for these counties and make this possible by allowing newly designated MSA counties to join with non MSA counties to form a natural community.

We believe strongly that the Chartering and Field of Membership rules in place since 2003 have proven effective and do not need a dramatic overhaul as proposed. These rules adapted in 2003 have provided a reasonable framework where by federal credit unions considering a charter conversion or field of membership change can work within.

The Southern Maryland is rural in nature and would not conform to the proposed rule change. We hope you take our situation and others such as ours into consideration. Two of the counties in the region, Charles and Calvert, are in Washington/Baltimore MSA, while the third county, St. Mary's, is not. While the metropolitan population is starting to impact the northern and western edges of Charles and Calvert Counties, the remainder of those two counties and all of St. Mary's County remain rural in nature. Persons in all three counties continue to shop, worship, work, volunteer in the three counties and in most instances, avoid the heavily populated, crowded areas closer in to the District of Columbia and Baltimore. We believe the proposed change in membership rules would or could adversely affect our chances for a charter change.

We would hope that the revised regulation would allow a mixture of rural and newly emerging metropolitan counties (MSA's) to be included in a single community. We are sure that many credit unions nationwide will be experiencing these same issues going forward as they apply to become a community charter.

In summary, we recommend the agency modify or withdraw the proposed changes to the Chartering and Field of Membership for Federal Credit Unions and continue to use the

rules established in 2003 in considering the definition of well defined local communities that includes both urban (MSA) and rural counties (non MSA).

Thank you for the opportunity to express my thoughts and concerns about the proposed changes to the NCUA Field of Membership rules. I appreciate your consideration of this request and sincerely hope the NCUA will make a favorable decision.

Respectfully,

Barbara Horn
President/CEO