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20 Wade Road
Latham, NY 12110
518-783-2211
Fax: 518-783-2266
888-664-2266

August 6, 2007
Via Facsimile Transmission

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

AUG07'07 AM 8:17 BOA

Dear Ms. Rupp:

We appreciate the opportunity to submit comments regarding the proposed changes to NCUA's Chartering and Field of Membership Manual.

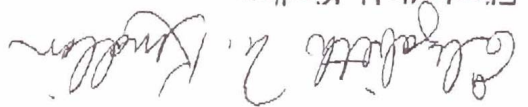
We would like to specifically comment on the section that defines Core Based Statistical Areas. Community Resource FCU supports this section of the proposal.

Our Credit Union has had a community charter since 2001 and currently serves nearly 6,000 members. We are based in a county that is part of a Metropolitan Statistical Area and that is the also the "core" of that MSA. The proposed changes would help us to better serve the needs of our members. A study of our existing membership shows that significant numbers work in the county we serve but live in surrounding counties. The proposed changes would improve the ability of our Credit Union to expand our service area and enable us to establish branches in closer proximity to where many of our members live. By recognizing the interaction of residents in a Core Based Statistical Area, this proposal acknowledges that well defined local communities exist beyond single political jurisdictions. Our geographic area is an excellent example of a Core Based Statistical Area – one county which is a center for employment, shopping and cultural activities that is surrounded by counties comprised of "bedroom communities". The extensive system of roads and the commuting patterns provide compelling evidence of the interaction between the residents and workers in these areas.

We strongly support enabling as many people as possible to have the opportunity and choice to join a credit union. This proposed rule clarifies how credit unions can more easily bring the benefits of membership to greater numbers of consumers. We encourage the NCUA Board to adopt the proposed changes.

Thank you for allowing us to share our thoughts on this proposal.

Very truly yours,



Elizabeth U. Kindlon
CEO