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FEB 12 '08 PM 1:04 BOARD

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February 11, 2008

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

Re: Comments on Notice of Proposed Rulemaking  
 Part 717

Dear Ms. Rupp,

On behalf of Hudson Heritage Federal Credit Union, we would like to thank the National Credit Union Administration (NCUA) board for inviting us to comment on Part 717, procedures to enhance the accuracy and integrity of information reported to credit bureaus under Section 312 of the Fair and Accurate Credit Transactions Act. We applaud the Board's desire to address the important subjects of FACTA.

In reference to information provided to credit bureaus being technically accurate but nonetheless paint an inaccurate picture of a member's creditworthiness, Hudson Heritage FCU is of the opinion that provided the information is reporting correctly and all information is being pulled from a credit union's database, the credit bureau is receiving all pertinent information.

The second policy issue is how much flexibility credit unions should be given in meeting the mandates. We believe it is the credit union's responsibility to have effective policies and procedures developed to begin with and the regulator's responsibility to address deficiencies.

Once again, Hudson Heritage Federal Credit Union would like to thank the NCUA for the opportunity to comment.

Sincerely,

Kathy Milich, NCCO  
 Director of Administration