



July __, 2008

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

Re: Proposed Amendments to the Incidental Powers Regulation

Dear Ms. Rupp:

The National Association of Credit Union Services Organizations ("NACUSO") is pleased to comment to the proposed amendments to the Incidental Powers Regulation. NACUSO supports all three (3) amendments to the Incidental Powers Regulation: (1) confirming that correspondent powers permit correspondent services to both domestic and foreign credit unions; (2) clarifying that finder activities authorizes a credit union to provide a number of marketing and administrative services to support both financial and non-financial services; and (3) confirming that a credit union may provide payroll services to its members. We believe that NCUA has the regulatory authority to make all three amendments and these amendments will enable credit unions to better serve their members.

We appreciate the opportunity to comment upon these proposed amendments.

Respectfully submitted,

Tom C. Davis
Tom C. Davis, President

Guy A. Messick
Guy A. Messick, General Counsel