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June 27, 2008

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

Re: Proposed Rule – Incidental Powers

Dear Ms. Rupp and Members of the NCUA Board:

I am writing on behalf of the Board of Directors and management team of Visions Federal Credit Union which is headquartered in Endicott, New York and serves 120,000 members in southern New York and northern Pennsylvania.

We support the proposed rules that will now:

- 1) Recognize that FCUs may offer Correspondent Services such as a receipt of funds for credit to an account to *Foreign* as well as state & FCUs;
- 2) Under *Finder Activities*; adds language about those credit unions may as a finder provide info or perform administrative functions about vendors - including financial products such as insurance. State & federal law concerning licensing requirements & RESPA regulations, etc. still apply. And finally;
- 3) Adds payroll services to the operational list of services a credit union can provide for its members - such as a disbursement from a commercial member's account to third parties.

In conclusion, we agree that our interpretation was that none of these areas were prohibited by the former regulation, but agree it is helpful to expand the examples.

Thank you for the opportunity to comment on this proposed rule.

Sincerely,

Frank E. Berrish
President/ CEO

cc: Fred Becker, President, NAFCU
Dan Mica, President, CUNA