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AUG 08 '06 AM 8:19 BOA

August 1, 2006

Ms. Mary Rupp  
Secretary of the Board  
NCUA  
1775 Duke Street  
Alexandria, VA 22314-3428

Re: Proposed Rule Making – Suspicious Activity Reports – NCUA Regulation 748.1(c)

Dear Ms. Rupp:

On behalf of Visions FCU of Endicott, New York, I would like to respond to the proposed changes on NCUA Regulation 748.1(c) concerning Suspicious Activity Reports.

Generally, any additional guidance in determining when Suspicious Activity Reports should be filed is welcome advice since this is an area of BSA compliance that can be difficult to understand and as a result well meaning financial institutions such as Visions FCU that wish to ensure we are in compliance probably file too many SAR reports in any given year.

When referring to criminal acts or suspected criminal acts such as addressed by the current guidance, it is of course more clear that SAR reports are required. We are in general agreement with the changes in language concerning the \$25,000 and \$5,000 amounts. We do suggest that language be inserted in the regulation that will allow for the processing of SARs within Shared Branch networks. Currently in our network, the branch that processes the transaction or activity completes the report and sends it to the member's credit union for processing.

We do not agree that every SAR report needs to be reported to the Board of Directors as you are suggesting in the changes. We believe this is too operational a detail and we do not believe that discussion of the 50 or so SARs that our credit unions files every year is a good use of Director time. This is particularly true when almost none of these ever amounts to any loss by the credit union and are being done primarily for BSA concerns.

We also do not believe that an SAR being filed on a Director be reported to every other Director and Committee member. We suggest that these reports go to the Supervisory Committee Chairperson for review or the Vice Chair if the Chair him or herself is the one being reported on.

Thank you for the opportunity to comment on these changes to this important regulation.

Sincerely,

Frank E. Berrish  
President/ CEO