



FEDERAL CREDIT UNION

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April 30, 2008

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

MAY05'08 AM 8:34 BOARD

Re: Proposed Rule – The Low-Income Definition

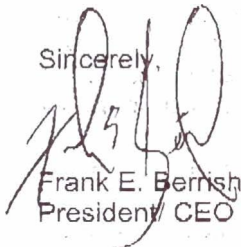
Dear Ms. Rupp and Members of the NCUA Board:

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 including a number of Underserved areas.

We support changing the definition of Low Income from the current formula of 80% of the National Median Household Income – with differentials for high income areas to the proposed standard of 80 % of the Median Family Income for a metropolitans or rural area, as defined.

Thank you for the opportunity to comment on this important matter

Sincerely,


Frank E. Bernish
President/ CEO

cc: Fred Becker, President
NAFCU

Dan Mica, President
CUNA

