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**From:** Beverley Rutherford [mailto:beverley.rutherford@vacu.org]  
**Sent:** Wednesday, April 30, 2008 1:44 PM  
**To:** \_Regulatory Comments  
**Subject:** Advance Notice of Proposed Rulemaking under Parts 708a and 708b

Thank you for the opportunity to comment on the Advanced Notice of Proposed Rulemaking under Parts 708a and 708b of regulations pertaining to mergers, conversions to another type of financial institution, and terminations of federal share insurance. I am responding on behalf of a large state-chartered credit union located in Virginia.

Overall, we do not support any new regulation on the areas addressed by the ANPR. In the past few years, NCUA has passed regulations requiring additional requirements for conversions that we feel adequately protect the interests of members. In cases where regulations have not existed to address a specific issue, NCUA has adopted a case-by-case approach. This appears to work well, and any additional regulation at this time in our opinion appears unnecessary and burdensome.

Please feel free to contact me should you have any questions. Thank you.

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