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FORT KNOX FEDERAL CREDIT UNION

WILLIAM J. RISSEL
PRESIDENT/CEO

CAROLYN F. DRAKE
EXECUTIVE VICE PRESIDENT

24 June 2008

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

Subject: Proposed Rule Part 701.1

Dear Ms. Rupp:

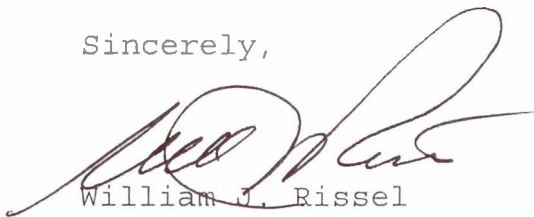
Please accept this letter as our official comment in response to subject proposed rule change.

We agree with most of the proposed change. However, we strongly oppose the addition of providing more "relevant, objective statistical data" to the existing "Narrative Statement". There would be unintended consequences using the example ratio methodology depicted in chart titled "Concentration of Depository Institution Facilities". In sparsely populated rural areas, the ratio of facilities to population may easily compute to "Not Underserved". In such rural areas, distance to facilities is not considered. Oftentimes, the census tracts used by CDFI Fund are large in size and sparsely populated. This problem could be overcome by granting an exemption to any distressed area that is not covered by credit union service.

We believe the current one page "Narrative Statement" with supporting relevant statistical information to be sufficient. We don't understand why NCUA is looking to add more empirical data to requests to serve those that are in CDFI Fund declared distressed areas. We believe NCUA should accept this governmental agency's determination of distress at face value.

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you for the opportunity to comment on this
proposed rule.

Sincerely,

A handwritten signature in dark ink, appearing to read 'William J. Rissel', written in a cursive style with a large loop at the end.

William J. Rissel
President/CEO

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edit Union League