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November 5, 2008

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

Re: Comments on Proposed Rule – Accuracy of Advertising and Notice of Insured Status

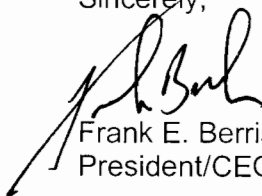
Dear Ms. Rupp and Members of the NCUA Board:

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.

As a credit union with multiple Shared Branch outlets, we welcome the new proposed rule which would allow a simplified rule on signage addressing those Shared Branch credit unions that do not carry Federal Deposit Insurance. A sign that simply states that not all credit unions served by the tellers are federally insured is easier to comply with on a day to day basis than a detailed list of those privately insured credit unions on the network. Since we are federally insured, we will insure that the language is written to comply with the new regulation but also make it clear that Visions Federal Credit Union *is* federally insured. Our interpretation of the proposed regulation seems to give us some leeway in the exact wording of the second sign.

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

Sincerely,



Frank E. Berrish
President/CEO

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cc: Mr. Fred Becker, President – NAFCU
Mr. Dan Mica, President - CUNA