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August 13, 2008

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

Re: Comments on Proposed Amendments to Chartering and Field of Membership Manual (IRPS 08-2)

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 four Underserved Areas.

We understand the agency's desire to standardize the definition of community as it applies to an Underserved Area and the current community requirements for Community Charters, but we believe adoption of many of the changes will unnecessarily restrict the ability of federal credit unions now and in the future to add underserved areas. The net result will be less financial choices for the citizens living in those areas because fewer credit unions will have the resources to provide the studies necessary to meet the more stringent tests or the new requirements will eliminate areas that currently qualify as underserved areas under CDFI guidelines. This seems a rash move when an emphasis seems to be on increasing credit union service to people of modest means based on the recommendations of the NCUA Task Force.

We will address specific provisions of the proposal below, but we also wish to stress upfront that all current areas that have been designated as Underserved Areas should be grandfathered, and we are against any moratorium on pending or future applications while this issue is being decided.

A. Definition of Local Community:

In our view, it is acceptable to have different criteria in establishing a "well defined community" when granting an Underserved Area than the Community Charter rules. There is no need to submit a separate letter describing how the area meets the community standard since, by statute, it is already defined within the CDFI definitions.



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B. Criteria of Economic Distress:

The current criteria of using the geographic units under the CDFI definitions for an Underserved Area using Census Tract areas is well defined and allows areas within larger MSAs to qualify for credit unions' service as Underserved Areas. There is no need to complicate the process by insisting they must apply uniformly within the MSA. Meeting the definition of an Underserved Community by the current objective criteria is an understood, workable practice that helps people in those areas.

C. Significant Unmet Needs for Loans or Financial Services

D. Underserved by Other Depository Institutions:

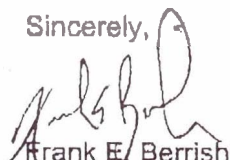
We do not think it is necessary to prove an area is underserved by other depository institutions in addition to a Narrative statement if the area qualifies as underserved. The area meets the criteria for being Underserved because of one or more of the serious financial deficiencies noted under the CDFI requirements. This by definition makes the assumption that the low cost, consumer-friendly services a credit union can offer in the environment is needed, regardless of whether there are a number of banks in abundance catering to high-end customers.

F. Prospective Applications:

As previously indicated in this letter, we are against proactively applying any modifications to this rule. Pending applications should be considered *retroactively* under the rule, based on when the credit union applied to serve the Underserved Area. To do otherwise seems highly unfair to the good faith efforts of those credit unions to follow current regulatory guidance.

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

Sincerely,



Frank E. Berrish
President/CEO

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

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