



October 14, 2008

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

Re: Proposed Rule – Reg Flex limitation on holding period for unimproved land

Dear Ms. Rupp:

This letter is in response to your request for comments on the recently proposed regulatory change to Reg Flex rules addressing the time frame for which unimproved land can be held prior to starting improvements. The reasons for the proposed modification to increase the time from three to six years reflect the challenges that credit unions face in acquiring unimproved locations for branches and administrative facilities. At times zoning, local master plans, and local resident input can affect the time required to fully develop a site. Extending the time to six years allows less pressure to meet a regulatory deadline, still prevents the ability to make real estate investments not contemplated by the Federal Credit Union Act, and does not meaningfully change the risks which Federal Credit Unions are allowed to take.

In short, the proposed change relieves regulatory burden on federal credit unions, does not increase risk, and allows better member value in developing credit union facilities. Xceed Financial Federal Credit Union supports this change.

Thank you for the opportunity to provide comment on this proposed beneficial regulatory change.

Regards,

A handwritten signature in black ink, appearing to read 'Brad Miller', is written over a light blue horizontal line.

Brad Miller, CPA, CFA
Senior Vice President and Chief Financial Officer
Xceed Financial Federal Credit Union