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June 27, 2008

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

Re: Proposed Rule – Credit Union Service Organizations

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.

**Expanding the scope of service to include persons within the field of membership:**

We support the expansion of the rule that would allow FCUs to lend or invest in CUSOs providing services under the recently expanded definition to include persons within the field of membership.

**Credit card loan origination:**

We support the changes to the rule that would allow CUSOs to originate and hold credit card loans as a principal on behalf of themselves or other credit unions. Cooperative ventures among credit unions to retain service of their members' accounts, rather than selling portfolios to other financial institutions is to be encouraged. For those credit unions that choose not to originate or hold their own accounts or find efficiency in working with other credit unions, this change and clarification can make a difference. We further believe that all lending not covered by the current rule should be permissible activities.

**Applicability of select CUSO rules to federally insured credit unions:**

We also support the expansion of a definition of a CUSO to include credit union owned entities that serve individuals eligible for credit union membership, such as the example given of those set up for check cashing of non-members in support of your mission of insuring the safety and soundness of FCUs and FISCUs.



**Recapitalization of insolvent CUSOs:**

Although we prefer that all such business decisions be left to a credit union's Board of directors and management, we understand the agency's concern with recapitalization when the net effect will be to cause a credit union to be inadequately capitalized or exceed the 1% investment limit and do not object to this change.

**Amendment requests**

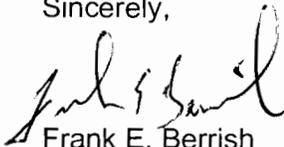
Although rarely used, we object to deleting the amendment provisions in 712.7 so that this avenue for a credit union to amend a CUSO rule remains open.

**Payroll processing**

We agree with amending the CUSO rule to allow CUSOs to provide payroll processing services directly to credit union members. This provision is of particular importance to those credit unions like Visions that want to compete fairly with banks and other financial institutions in filling the needs of our member business owners, particularly the small business owners who are looking to credit unions more and more for services in the current economic climate.

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

Sincerely,



Frank E. Berrish  
President/ CEO

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cc: Fred Becker, President  
NAFCU

Dan Mica, President  
CUNA