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May 18, 2011

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

Re: Comments on Proposed Rule on Net Worth and Equity Ratio 12 CR Parts 700, 701, 702, and 741

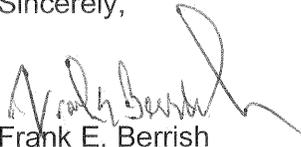
Dear Ms. Rupp and Members of the NCUA Board:

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 126,000 members in Upstate New York and northern Pennsylvania.

We have reviewed the proposed regulatory change and have no objections to including Section 208 assistance in the calculation of Equity Ratios as defined in the proposal. We do believe that in the interest of transparency, Section 208 assistance should be delineated as a separate line item on the financials and in the 5300 reports of the Federal Credit Union so its financial position without assistance is clear for its members.

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. Bill Cheney, President - CUNA

