



April 15, 2010

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

Re: Comments on Proposed Regulation 12 CFR Part 701,
RIN 3133-AD65

Dear Ms. Rupp:

The Maryland & District of Columbia Credit Union Association (MDDCCUA) appreciates this opportunity to comment on the Agency's proposed amendment to its Chartering and Field of Membership Manual for Federal Credit Unions.

MDDCCUA is a regional trade association serving the needs of over 180 credit unions in Maryland and Washington, D.C., which serve more than 2 million members. We applaud the Board for considering methods to build a solid record that demonstrates its decisions are made on a rational, not arbitrary means in order to preserve credit unions and support uniform methods to reach these decisions.

A recent survey confirms that a significant number of our member credit unions are considering charter modifications as part of their future growth plans and a consistent and timely review of charter modifications is essential.

We raise the following points for your consideration:

- While we believe placing greater reliance on quantifiable data as opposed to subjective information and review would help limit litigation, we also believe that credit unions should have an opportunity to utilize a narrative in attempting to qualify for the provisions of a well defined community.
- Underserved areas should not have to qualify as well-defined local communities, as that approach is not required by the Federal Credit Union Act. Further, the Agency should provide credit unions with the requisite resources necessary to clearly determine the geographic boundaries of any underserved regions. In particular, maps that clearly delineate these geographical boundaries should be made available.
- Provisions that would require the Board's review of marketing plans and business plans after an area has been approved should only be conducted in specific instances where



safety and soundness is an issue for a specific credit union. Sanctions should not be considered unless otherwise warranted by lack of performance.

We appreciate the opportunity to provide our area credit union's input on this matter. Should you need further information concerning the content of this letter, please contact B. Kirk Fox, VP Regulatory Affairs at 800-492-4206, Extension 301.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael V. Beall".

Michael V. Beall
President/CEO