VISIONS
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February 8, 2010

Paul Sanford, Executive Secretary
Federal Financial Institutions Examination Council
L. William Seidman Center
Mailstop: D 8073a
3501 Fairfax Drive
Arlington, VA 22226-3550

RE: Docket Number FFIEC-2009-0001

Dear Mr. Sanford and Members of the Council:

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 over 120,000 members in southern New York and northern Pennsylvania.

We offer our members both HECM Reverse Mortgages and a proprietary type that we do in association with other credit unions, and although we have made only a limited number of these loans since we began offering them to our members, we are glad to have this ability to help those members for whom this is a useful product. In our experience, these programs actually are allowing some of our senior members to stay in their homes rather than have to sell the homes because of tax and medical bill burdens that are difficult to pay on a fixed income. On ***both*** the HECM and our private loan, we make sure that all counseling is completed, explain all the options to our members, provide all disclosures, and we make sure that our members go into their loans fully informed.

I understand that some lenders that make private loans are less scrupulous than Visions or other credit unions and that this may be one of the drivers that is causing you to review the regulation and the disclosures required. Therefore, we are in general agreement with the proposed changes, particularly the requirement that proprietary loans offer the same counseling and disclosures that are required on HECM mortgages and should avoid any conflict of interest with specific incentives that are inappropriate for lenders. As I explained, we already give the disclosures and require counseling on our proprietary reverse mortgage program, and Credit Unions have always had similar restrictions on incentives and this will not affect us at all.

However, some of the language in the proposal does seem a bit excessive for the promotional material such as disclosing that someone may lose their home. That is true, of course, on any mortgage that is not paid on time and is made clear in the counseling and disclosures required now for HECMs. That is not to say false or misleading statements should ever be used in advertising, but the proposal seems to go a bit too far.

In short, the guidance should be more specific about the new disclosures that will be used and be more reasonable on the advertising requirements, only forbidding false or misleading statements in as specific a manner as possible. Perhaps certain "trigger terms" could be used to require additional disclosure on the advertisement such as is done with other lending regulations if rates or terms are advertised.

We appreciate the reasons the council has for the proposed guidance and hope you will consider some final changes to make it more workable. Thank you for the opportunity to comment on this proposed guidance.

Sincerely,

Frank E. Berrish
President/CEO

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