



March 26, 2018

Gerard Poliquin
Secretary of the Board,
National Credit Union Administration,
1775 Duke Street,
Alexandria, VA 22314-3428

RE: Comments on NCUA Proposed Rule (Ways to streamline, clarify and improve standard Federal Credit Union bylaws)

Dear Mr. Poliquin:

This letter represents Beacon Credit Union's comments on how to streamline, clarify, and improve Federal Credit Union Bylaws.

1. How can the Board improve the FCU bylaws amendment process?

Allow the Board of Directors to make changes to the Bylaws with a simple majority vote. The changes should then be submitted to the NCUA and/or State regulating body for review to ensure the changes do not violate any existing regulations or laws. The NCUA will send confirmation that the changes are acceptable or not to the Board Directors. If no response is received within a 30 day time period the Board of Directors of the credit union can assume the changes are acceptable.

2. How can the Board clarify the FCU bylaws provisions addressing limitations of service and expulsion of members?

The Bylaws need to give the Board of Directors the authority to set guidelines for membership beyond the charter definition. The criteria that the board establishes must not be discriminatory so guidelines would need

to be established in the Bylaws. The current expulsion of member's guidelines could be expanded to give the Board of Directors more authority in this area.

3. How can the Board improve the FCU bylaws to facilitate the recruitment and development of directors?

The recruitment and development of directors needs to rest with the individual credit unions. The FCU bylaws could be change to allow credit unions to compensate their directors. Some state chartered credit unions have this ability now and it would help credit unions attracted more highly qualified professionals.

4. How can the Board improve the FCU bylaws to encourage member attendance at annual and special meetings?

Changes to the notification requirements in the bylaws will have no impact on member attendance at annual meetings. Members only come to meetings to eat and win a prize. This has been our experience but cannot speak for any other credit union.

5. Should the Board eliminate overlaps between the NCUA regulations and the FCU bylaws?

Eliminate the overlaps.

Sincerely,



Greg W. McConville
President/CEO
Beacon Credit Union