



Michael J. Castellana  
*President & CEO*

SEFCU Headquarters, Kiernan Plaza, 575 Broadway, Albany, NY 12207

Mail: SEFCU @ Patroon Creek  
Patroon Creek Corporate Center  
700 Patroon Creek Blvd.  
Albany, NY 12206-1067

Telephone: 518-464-5218

Web: [www.sefcu.com](http://www.sefcu.com)

May 17, 2018

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

Re: Request for Extension of Comment Period on NCUA, 12 C.F.R. 701-Advanced  
Notice of Proposed Rulemaking ("ANPR"), 83 Fed. Reg 12283 (March 21, 2018)  
FR Docket 2018-05625 RIN 3133-AE86]

Dear Mr. Poliquin:

SEFCU respectfully requests that the NCUA extend the public comment period on the above-referenced ANPR a minimum of thirty (30) days beyond the currently scheduled public comment deadline of May 21, 2018.

SEFCU has concluded that the ANPR raises complex questions regarding the modernization of the bylaws of a federal credit union. The development of thoughtful comments in the time provided is not achievable and is therefore inconsistent with the requirement to provide the public an adequate opportunity to participate in the rulemaking process. It is in the interest of the NCUA to invite and accommodate all interested parties that may contribute to the development of agency rules. Therefore, extending the public comment period by at least thirty (30) days for this ANPR will serve the government's interest in receiving comments that will identify issues and offer recommendations. SEFCU is not aware of any harm or prejudice that NCUA or the rulemaking proceeding will incur by granting this request.

Thank you for considering this request. We would be happy to further discuss this matter, if you so desire.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Castellana", written over a circular stamp.

Michael J Castellana  
President and CEO  
SEFCU