



PO Box 10018 Manhattan Beach, CA 90267 | 877.254.9328 UnifyFCU.com

May 17, 2018

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

RE: Comments on Federal Credit Union Bylaws, advance notice of proposed rulemaking

Dear Secretary Poliquin,

On behalf of UNIFY Financial Federal Credit Union Members, Board of Directors and the Management Team, I am writing to you regarding the National Credit Union Administration's advanced notice of proposed rulemaking on Federal Credit Union Bylaws. NCUA's Board requests comments on the following questions:

How can the Board improve the FCU bylaws amendment process?

UNIFY supports improving the FCU bylaw amendment process and suggests the addition of a timeframe for a FCU to receive a response back from NCUA's Office of Credit Union Resources and Expansion (CURE). Since most bylaw change requests are the result of an operational concern by the credit union, an understood timeframe for a response would help facilitate this change in a more efficient manner.

The Board also asked for comment on how to increase transparency regarding timely responses and we suggest CURE publish statistics for the response time online to provide accountability of meeting the established timeline

How can the Board clarify the FCU bylaws provisions addressing limitation of service and expulsion of members?

UNIFY supports the Board in clarifying the limitation and expulsion of members within the bylaws. UNIFY feels strongly that a FCU should have the ability to expel members who have committed a crime against the credit union. Allowing a credit union board to enforce a policy that permits the expulsion of a member engaged in fraud or unacceptable behavior would assist with managing risk, controlling losses, and addressing safety concerns.

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

UNIFY believes that FCUs do not need the FCU bylaws to provide additional guidance in the areas of recruiting of potential Board candidates or the development of the existing Board. Each FCU should be able to make the business decision on how to attract and train the Board that best fits their individual CU based on their individual needs.

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

UNIFY does not believe it is the responsibility of the Board or the FCU bylaws to provide guidance on increasing member attendance at annual or special meetings. UNIFY believes additional guidance by the Board to harness new technologies such as web-based conferencing at annual and special meetings could cause a financial burden for some credit unions. New technologies, if required, could also produce security and verification concerns, such as to how to verify membership for voting during these meetings.

Should the Board eliminate overlaps between the NCUA's regulations and the FCU bylaws?

UNIFY believes the Board should eliminate duplicative guidance that lives within the bylaws and NCUA regulations to assist credit union's efforts in complying. If the Board can remove all regulatory overlap from the bylaws and keep the requirements within NCUA regulations this would reduce the compliance burden and confusion of a FCU's responsibility to look to the FCU bylaws for some of the requirements and to NCUA's regulations for the rest.

We appreciate the opportunity to comment on this proposed regulation and would like to thank the agency for your commitment to streamline, clarify, and improve the federal credit union bylaws for the federal credit union industry.

Sincerely,

A handwritten signature in black ink, appearing to read 'S Parolisi', with a stylized flourish at the end.

Suzanne Parolisi
AVP Compliance
UNIFY Financial Federal Credit Union