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May 21, 2018

Gerard S. Poliquin, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, Virginia 22314– 3428

Secretary Poliquin,

Thank you for the opportunity to comment on the NCUA's Federal Credit Union Bylaws proposal.

We appreciated your invitation to have a member of our staff participate on the NCUA's 2013 Bylaw Working Group and several of the comments below originated from the recommendations of your Working Group that we feel would be beneficial in simplifying and clarifying the bylaws and bylaw amendment process.

First, we feel that it would be beneficial for NCUA to provide official commentary on the bylaws that would help to clarify the flexibilities granted to credit unions that would still meet NCUA's requirements. Additionally, we would find it immensely beneficial for NCUA to publish approved bylaw modifications, anonymously, that could be used by other credit unions.

In Article III, we recommend clarifying that eligible Trustees can open membership accounts without requiring a separate membership account owned by the Trustee as an individual member. We request a modification of language to "When shares are issued in a revocable trust, the trustee(s) must be eligible for membership in this credit union in his or her own right."

Additionally, we recommend a similar process and language for co-borrowers instead of requiring co-borrowers to open separate membership accounts. In actual practice, this leads to dormant accounts as the main account is used by both the primary member and co-borrower and an additional account is not desired or needed.

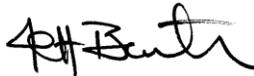
With regard to Article IV, we ask you to consider modifying the requirement for 750 members to call a special meeting to be a percentage of members, such as 1% or 5%, or 750, whichever is greater. Seven hundred and fifty is a low number of members to require a special meeting when the total membership is greater than 75,000. In general, I would like to see less prescriptive numerical requirements versus percentages so that the requirements make sense for federal credit unions of all sizes.

In addition, in Article IV, we request a less prescriptive requirement for notice of the annual meeting. It should be clarified that notice can be provided more than 75 days prior to the meeting as long as it is also given within 30 days of the meeting. In timing notice of the annual meeting with periodic statement mailings and desiring to provide more notice to members with election information, the 75 day boundary can limit communications to members.

We also believe that Article VII could use clarification regarding tasks of the Chief Executive versus the Board where the Board has hired a CEO to handle many of the management responsibilities of a credit union. This is also true where a CFO has been hired as the Financial Officer.

Thank you for the opportunity to provide comments. Should you have any questions or would like to discuss these comments further, please contact my VP of Marketing and Communications, Harmonie Taddeo at 703-709-8900 or htaddeo@nwfcu.org.

Sincerely,

A handwritten signature in black ink that reads "Jeff Bentley". The signature is written in a cursive, flowing style.

Jeff Bentley
President/CEO
Northwest Federal Credit Union