

**From:** Marie Campbell  
**To:** [Regulatory Comments](#)  
**Subject:** Proposed Rule 12 CFR Part 701, Appendix A - Federal Credit Union Bylaws  
**Date:** Tuesday, November 20, 2018 11:57:16 AM

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To Whom It May Concern,

On behalf of GTE Federal Credit Union dba GTE Financial (“GTE”), I am writing to you regarding the National Credit Union Administration’s (NCUA) proposal to update, clarify and simplify the FCU Bylaws- specifically to update and conform the Bylaws to legal opinions issued by NCUA in the past and to remove all dated and obsolete provisions. I fully support this proposal and would ask for additional clarification on specific areas.

Under Article II, the Qualification of Membership, I think the Board should include clarification as to what constitutes disruptive, abusive and belligerent- that there is some uniformity in application- and an avoidance of the subjectivity standard.

Suggestions:

**Disruptive-** any behavior that interferes with the normal ebb and flowing of the business

**Abusive-** behavior that results in the mistreating of an employee or member

**Belligerent-** behavior that is loud, disruptive to the normal ebb and flow of business, is confrontational combative or confrontational.

The Proposed Rule goes further to state that a FCU may use whatever lawful means it deems necessary to address circumstances where a member poses risk to harm the FCU, its members or its staff. Is there limitation to this? Is this parameter inclusive of immediate expulsion? Can the expulsion be later ratified if the behavior is perceived to be imminently dangerous? I would suggest that the rule expounds upon the levels of autonomy a FCU has in these types of cases. It then becomes obvious that after such levels of “lawful means it deems necessary” are taken, a FCU is then left to create policies and procedures complimentary to the Rule.

Thank you for the opportunity to comment on this proposal. As stated above, this is a necessary and welcomed rule. The right guidance is needed by the FCU so as to obviate the need for continued requests for opinion letters seeking additional clarification. If I can be a source of any further information on this comment letter, please do not hesitate to contact me at [marie.campbell@Gtefinancial.org](mailto:marie.campbell@Gtefinancial.org) or by phone at 813-414-6219.

Respectfully,  
Marie

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