

November 27, 2018

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

RE: Comments on FCU Bylaws

Dear Mr. Gerald Poliquin,

I am writing on behalf of Quest Federal Credit Union, which serves Hardin, Logan and Wyandot counties in Ohio. We have 14,000 members and \$117m in assets. Quest FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposal to update and modernize the federal credit union bylaws (FCU Bylaws).

Quest FCU enforces the limitation of services policy and believes that this policy should remain unchanged. We are a cooperative financial institution and if a member has caused a loss to other owners of our cooperative we believe that their services should have limitations.

Likewise, we fully agree with the member in good standing language and believe it should be reflected in by-laws.

A member that is disruptive and/or violent or abusive in anyway should not be considered a member in good standing and should also be subject to the limitation of services policy.

We notify our members of our annual meeting through our statement messages, via an email message, on our website and in our lobbies 30 to 60 days prior to the meeting. This is ample notification and should be considered more than adequate notification.

Quest is fortunate to have solid member participation in our annual meeting and 12 members should constitute a quorum for action to be taken. With that said, we do believe that a member should be allowed to attend a meeting "virtually".

We believe that a combination of voting methods, in-person, mail and via website should be allowed for action taken at an annual meeting including a by-law amendment.

Quest advertises our nominating period in the same manner as our annual meeting and our membership has ample notice of the nominating cycle. This should serve as adequate notification of their right to participate.

We thank the NCUA for taking this proactive approach to modernizing the FCU Standard Bylaws. We believe that credit unions should have flexibility to work within and modify when necessary, our bylaws in a manner that is open and fair but not restrictive. Each credit union is different and faces different challenges within our fields of membership and therefore should be allowed ample flexibility within the bylaw structure to conduct and continue business operations.

Thank you for the opportunity to comment on this proposed rule and for considering our views on the FCU Bylaws and staff commentary.

Sincerely,

Matthew Jennings
Chief Executive Officer
Quest FCU

cc: CCUL