

From: Marti Gwin
To: [Regulatory Comments](#)
Subject: Marti Gwin - Comments on Federal Credit Union Bylaws ANPR
Date: Tuesday, January 8, 2019 7:48:11 PM

Dear NCUA Board,

I am writing on behalf of Wauna Federal Credit Union (WCU). Thank you for the opportunity to comment on the proposed rulemaking regarding streamlining, clarifying, and improving the standard Federal Credit Union (FCU) bylaws.

We have feedback regarding the current election procedure found in Part 701, Article V. Elections, Option A4, Election by Electronic Device or Mail Ballot.

WCU switched to this option five years ago due to declining attendance at our annual meeting. Our goal was to increase the overall membership participation in elections. Digital elections provide the opportunity for members to vote who might not attend the annual meeting because of the distance they would need to travel, mobility issues that make travel difficult, or scheduling conflicts.

We found that conducting electronic voting prior to our annual meeting increased the percentage of our membership participating in elections by an average of 250% compared to the 5 years prior. Although attendance at the annual meeting has continued to decline, last year we had 373 views of our annual meeting's live-broadcast on social media and almost 600 members participated in the electronic voting process to elect the board.

Although we have had great success increasing member participation, the electronic voting procedure is costly. It requires credit unions to mail paper ballots to all members that have not opted to receive notices or statements electronically, in addition to the notification of the availability of the electronic voting option. The expense of printing and mailing ballots in addition to providing electronic access is much greater than the cost of a paper vote conducted during the annual meeting. We believe that the bylaw, the way it is currently written, discourages credit unions from choosing the electronic voting method due to the mailing expense despite the great potential to increase membership participation in elections.

We recommend allowing a notice to be mailed to all members informing them they may vote online, in person at a branch, or by requesting a ballot; and providing directions for each method. We do not think the need to request a paper ballot creates a hardship on the members. We base our opinion on our past experience of conducting voting at the annual meeting as well as notifying membership by mail that they could request an absentee ballot prior to the meeting. Our records show that during the 5 years prior to the switch to electronic voting, up to 38% of votes were cast from members requesting an absentee ballot after they received the annual meeting notification.

We believe allowing our recommended change to the voting process, combined with video broadcast of the annual meeting, will increase the overall membership participation in the democratic process of elections while also allowing credit unions to manage the cost of growing memberships and broader geographic boundaries.

Thank you,

Marti Gwin



Marti Gwin

Compliance Manager

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