

From: Rogers, Jill
To: [Regulatory Comments](#)
Subject: Jill Rogers Comments on FCU Bylaws
Date: Wednesday, January 9, 2019 8:08:26 AM

Please find comments on two of the proposed bylaw amendments below. Thank you so much for your time.

CURE has 90 days to approve a bylaw amendment request, and if no response is provided in the prescribed time, it will be considered a denial.

First, when a credit union seeks to amend a bylaw, it is most likely doing so because a specific issue has arisen and needs to be dealt with in a timely manner. Expecting a credit union to wait three months for a response is unreasonable. Furthermore, allowing an amendment request to be denied simply because CURE failed to respond will result in a lack of explanation and commentary for the credit union, in addition to an excessive waiting period. CURE should not be able to address amendments it wishes to deny by simply ignoring the request. We propose a period of 30 or 60 days and that a failure to respond be treated as an acceptance.

A quorum consists of 12 members, excluding board, staff and officers

This proposed provision is unreasonable and burdensome. We cannot force members to appear at meetings. Our position is that members will show up if they are unhappy with something. Our members are happy with our products, services and rates and therefore feel no need to inconvenience themselves by coming to meetings. We might support further commentary on how to improve notice and awareness of meetings, but a requirement that 12 members are needed for a quorum is burdensome to the credit union and to the members who simply want a great place to bank, not a place where they are obligated to attend meetings.

Thank you!

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