



Michael Lee  
Director of Regulatory Advocacy  
League of Southeastern Credit Unions  
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Gerard Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke St.  
Alexandria, VA 22314-3428

Re: Federal Credit Union Bylaws (12 CFR Part 701) - RIN 3313–AE86

Mr. Poliquin,

The League of Southeastern Credit Unions & Affiliates (LSCU) appreciates the opportunity to comment on Federal Credit Union Bylaws. The LSCU is a trade association that represents 244 credit unions in Alabama and Florida. Our mission is “to create an environment that enables credit unions to grow and succeed.” We support the NCUA’s efforts to update the Federal Credit Union Bylaws.

We support the proposed rule to adopt a 90-day-calendar deadline for NCUA to approve a bylaw amendment. We also support NCUA’s flexibility in allowing credit unions to utilize technology in simulcasting annual or special meetings via internet and allowing members the option to vote electronically, as well as in person.

The input from our federal credit unions regarding clarification of terms associated with behavior that warrants limitation of service is that they would like to leave the definitions as loose as possible. This would maintain the flexibility in a credit union’s enforcement of a policy that may be more narrowly defined than a proposed definition by NCUA (thereby causing a conflict between bylaw and policy), yet has been crafted by the credit union’s experience in handling disruptive members. There are certain disruptive behaviors that all reasonable people would expect to lead to expulsion or limitation of service. It is not those behaviors, physical abuse of employees as one example, but more subjective or

continuous bad acts that a credit union may need to combat and must have flexibility in their policies to address those circumstances. We also support NCUA's proposal to include an option to use a combination of in-person, mail-in, and electronic voting in elections, perhaps having this method as the default option. We also support widely publishing the call for nominations, including on the credit union website. We believe this could increase participation in credit union governance by a greater portion of the membership than has been the case in the past.

We appreciate the board's efforts to update the bylaws for federal credit unions and look forward to working on other issues that benefit our movement in the future. Please feel free to contact me if you have any specific questions on our thoughts or this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Lee".

Mike Lee