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January 14, 2019

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

VIA ELECTRONIC DELIVERY

***Re: NCUA Proposed Changes to Federal Credit Union Bylaws***

Dear Mr. Poliquin:

On behalf of Truliant Federal Credit Union, (hereinafter “Truliant”), I am writing regarding the National Credit Union Administration’s, (hereinafter the “NCUA”), proposed rulemaking on its proposed changes to the Federal Credit Union bylaws (hereinafter “FCU Bylaws”). Truliant has approximately 250,000 member-owners and \$2.3 billion in assets. The purpose of this letter is to urge the NCUA to continue to adopt sensible rules which empower credit unions to efficiently and effectively meet the needs of its member-owners. These updates are timely and will prove useful in modernizing credit unions’ abilities to compete in the financial sector of an ever-increasingly global marketplace, and I appreciate the opportunity to comment on these proposed updates to the FCU Bylaws. We support retaining the incorporation of FCU Bylaws in NCUA Regulation to avoid conflict with state law. We also support streamlining the cases where FCU Bylaws and NCUA regulations overlap. Better defining the timeline for CURE to process proposed bylaw amendments would also be a welcome improvement. I would like to comment on a few of the changes and how they might impact our operations.

**Article II – Qualifications for Membership:**

The inclusion of a “member in good standing” concept into the FCU Bylaws is a major benefit to the industry because its definition provides some clarity in implementing limitation of services’ policies and management of disruptive and abusive member-owners. Safety and security are of paramount concern for all credit unions. As we find new and innovative ways to serve our member-owners, we are constantly faced by new and emerging threats to the safety and security of our premises. The “member in good standing” concept acknowledges that credit union relationship requires as much cooperation and vigilance of our member-owners as it does our staff in order to help improve the lives of our member-owners. So, to more clearly define “disruptive” and “abusive” members empowers us to protect our staff and our members. These proposed changes provide greater flexibility in tailoring our response to the specific needs of disruptive and abusive member-owners. Thus, I appreciate the NCUA’s willingness to empower credit unions, like Truliant, to take appropriate actions to maintain its commitment to its core mission.

### **Article III – Shares to Members:**

As the economy shifts and our member-owners more creatively craft their estates, Truliant recognizes the need to make trust accounts more accessible throughout the planning process. Now that the proposed changes enable individuals to join the credit union through trust-entities, rather than opening a separate share account, we think this will provide more flexibility for individuals choosing credit unions over banks to satisfy their estate planning needs. Delineating a revocable and irrevocable trust significantly helps credit unions understand how to recognize and treat trust accounts. Therefore, I support these additions to Article III's inclusion of trust accounts to enable credit unions to maintain their competitive edge over their banking counterparts.

### **Article IV – Meetings of Members:**

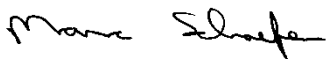
Encouraging member-owner attendance and participation at annual and special meetings is a critical piece in providing member-driven financial services. So, I welcome the NCUA's attempt to modernize the meeting process and to expand options for credit unions to reach their member-owners for annual and special meetings through live webcasts and video capabilities. Truliant takes pride in expanding our digital and mobile footprint, and we know that this will enable us to maintain our competitive edge in the marketplace. In keeping with the fast and growing pace of technology, this change to the FCU Bylaws allows credit unions to maximize their reach and encourages member-owners to be aware and participate in the decisions of their financial institution. However, I would urge the NCUA to go one-step farther and encourage hybrid meetings that are both virtual and in-person to provide a number of options for member-owners to participate. Allowing hybrid meetings for credit unions of an appropriate size and complexity will provide greater flexibility for member-owners to attend and participate.

### ***Conclusion***

Overall, we applaud the NCUA's initiative to modernize the FCU Bylaws in order to empower credit unions to better serve its member-owners. I hope that the NCUA will continue listening to the industry and make additional timely updates that will enable credit unions to meet evolving member needs in a competitive financial marketplace. As part of our mission, Truliant is committed to supporting the credit union industry through its advocacy for an appropriate level of up-to-date regulatory oversight while maintaining the safety and soundness of the industry.

Thank you for the opportunity to comment. If you have any questions or concerns, then please do not hesitate to contact me at (336) 659-1955.

Respectfully Submitted,



Marcus B. Schaefer  
Chief Executive Officer  
Truliant Federal Credit Union