



Michael Lee  
Director of Regulatory Advocacy  
League of Southeastern Credit Unions  
22 Inverness Parkway, Suite 200  
Birmingham, AL 35242

1/22/2019

Re: Fidelity Bonds 12 CFR 704, 713 [RIN 3133-AE87]

Mr. Poliquin,

The League of Southeastern Credit Unions & Affiliates (LSCU) appreciates the opportunity to comment on fidelity bond coverage for credit unions. 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 NCUA’s proposal to allow qualifying CUSOs to be included under a credit union’s fidelity bond coverage. We think this may save credit unions with CUSOs time and money in compliance and operational costs. Otherwise, we have had no feedback from our credit unions indicating that the proposed rule regarding extended discovery coverage after distribution of assets in a voluntary liquidation would increase the compliance burden for our federally insured credit unions.

We appreciate the board’s efforts to review the fidelity bond coverage for 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 "Michael Lee", is positioned above the printed name.

Michael Lee