



**New York State
Credit Union League, Inc.
and Affiliates**

"*Serving and supporting credit unions since 1917.*"

October 13, 2005

Ms. Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Dear Ms. Rupp:

On behalf of the New York State Credit Union League (NYSCUL), I would like to thank the National Credit Union Administration (NCUA) Board for inviting us to comment on the proposal to amend the federal credit union (FCU) bylaws. We applaud the Board's desire to address revisions to the FCU bylaws and we encourage NCUA to continually look at ways to improve the efficiency and effectiveness of the bylaws.

The Federal Credit Union Act requires the NCUA Board to prepare bylaws that are to be used by FCUs. The Board last reviewed the bylaws in 1999 and is revisiting the bylaws to determine if there is a need to revise, clarify and simplify the existing bylaws.

The Board is proposing the addition of staff commentary that will outline NCUA's interpretation on certain issues contained in the bylaws. We support this change. In the past, NCUA has utilized legal opinion letters to provide necessary guidance to credit unions where there has been some ambiguity in the bylaws. By adding the staff commentary to the effected sections of the bylaws, credit unions will have more immediate access to NCUA's official interpretation and not need to look to other resources to determine the agency's intent.

The Board is also proposing a change to Article IV Section 1 – Meeting of Members – to eliminate the requirement that the credit union's annual meeting be held "within a period authorized by the Act." The FCU Act no longer specifies a time period in which the annual meeting must be held, making this bylaw provision outdated and obsolete. The amended bylaws will include a blank for the FCU to insert the date of its annual meeting. We support this change as it reflects the flexibility afforded credit unions by recent amendments to the FCU Act. Credit unions are in the best position to determine, based on the composition of their membership, the best time to hold the annual meeting in order to maximize attendance.

Once again, the New York State Credit Union League would like to thank the NCUA Board for the opportunity to comment. We would be happy to discuss this matter further, if you so desire.

Sincerely

William J. Mellin
President and CEO, NYSCUL