

Dear Director Jekel,

Numerica Credit Union has the following comments:

1. On page 2, under the paragraph titled "Exception", we suggest changing the words "travel costs for training" to "all expenses associated with credit union business related travel, including those for a guest". We believe that this change will clarify that all costs associated with business associated travel, including meals and guest activities while the director/supervisory committee member is being trained, will be excluded from the definition of compensation. It will also clarify that travel costs for other business related purposes, such as meetings, will be excluded.

2. On pages 2 and 3, in subsections (b)(i) and (ii), we suggest the following revisions:

a. In subsection (i) substitute the words "of reasonable travel expenses" with "of all reasonable expenses associated with credit union business related travel". This clarifies that all costs associated with travel, including meals, tipping, and other expenses incurred while traveling are excluded. It also limits exclusion to reimbursement for business related matters.

b. In subsection (ii) substitute the words " of reasonable travel costs" with "of all reasonable expenses associated with credit union business related travel". The reasons for this change are the same as described above.

I want to thank you for the opportunity to comment. Have a wonderful day!

Sincerely,
Lynn Ciani
General Counsel
Numerica Credit Union