

NATIONAL CREDIT UNION ADMINISTRATION Washington, D.C. 20456

GC/JT:sg SSIC 3700 90-0128

Office of General Counsel

February 8, 1990

Michael D. LaBarbera, Esq. LaBarbera and Campbell West Kennedy Legal Center 1907 W. Kennedy Boulevard Tampa, Florida 33606

> Re: Tampa Bay Federal Credit Union Charter No. 353 (Your January 30, 1990, Letter)

Dear Mr. LaBarbera:

You have asked whether it is permissible for a Federal credit union ("FCU") to require that petitions for board of director nominations include the membership numbers of members signing the petition. The membership numbers will be used by the FCU to verify signatures on the petition. Neither the FCU Act, NCUA's Regulations, nor the Standard FCU Bylaws prohibit the use of membership numbers on petitions. The FCU Standard Bylaw Amendments require that the identification form that accompanies a mail ballot contain the member's credit union account number. (See FCU Standard Bylaw Amendments, Article VI, Section 8.) We have no objection to the FCU requiring membership numbers on petitions.

Sincerely,

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HATTIE M. ULAN Associate General Counsel

cc: Jim Sharpe, Region III

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