

March 21, 2017

BY E-MAIL (commission.consultation@ficombc.ca)

Commission Consultation
Financial Institutions Commission
2800 – 555 West Hastings Street
Vancouver, BC
V6B 4N6

Re: Public Comment on Coast Capital Savings

Regarding the application by Coast Capital Savings Credit Union for continuance as a federal credit union, I would like to request that you give further notice and extend the deadline for public comment for the following reasons:

1. Although the news release on your website is dated March 1, 2017 and the deadline is given as March 30, 2017, it would be misleading to suggest that 30-day's notice was given. According to your media spokesperson, notices appeared in newspapers, but only throughout B.C., and not until later (e.g., March 9, in the case of the Vancouver Courier).
2. Your website represents that the RSS feed is a valid way to receive notices from FICOM. However, the attached screenshots show that the news release requesting comment was not posted to the RSS feed. People who rely on this notification mechanism have still not received notice.
3. In your news release you correctly say that "... this change has ramifications not only for Coast Capital Savings Credit Union members but also for the general public and other businesses." This includes credit unions across Canada, obviously. The credit union ethos includes co-operation between credit unions—co-operation that does not stop at provincial boundaries. FICOM should respect this tradition by giving credit unions outside of British Columbia time to provide feedback.
4. Ontario credit unions, in particular, have a strong interest in this issue because they will be directly affected by the (monetary) withdrawal of Coast Capital Savings from Central 1.
5. Only last week (March 15, 2017) did Coast Capital Savings publicize the proposed bylaws (they call them "rules") under which Coast Capital Savings would operate as a federal credit union. The result of the vote to adopt these bylaws won't be known until May 3, 2017. Your March 30, 2017 deadline for public comment implies that you do not think that the proposed bylaws are relevant to FICOM's ultimate decision. I disagree with this position because for Coast Capital Savings members who are making submission to FICOM, the proposed bylaws provide relevant subject matter.
6. The transition of one of Canada's largest credit unions to a federal credit union requires deeper analysis and therefore longer notice than would be given for lesser actions taken by FICOM.

These are not hypothetical concerns. For several months I have been undertaking to organize a trans-Canadian discussion for the purpose of eventually providing you with input. Despite monitoring you purposefully (via your RSS feed), I have only learned incidentally about your comment period, with fewer than 14 calendar days (10 business days) remaining. Furthermore, I have reason to believe that the new bylaws proposed by the Board of Coast Capital Savings, which I not yet received by mail, are directly relevant in making a holistic assessment of the application made to FICOM by Coast Capital Savings.

Accordingly, I request:

- a. That FICOM modify its processes, methods, and deadlines to acknowledge that the proposed bylaws of a credit union seeking federal continuance are valid subject matter for public comment,
- b. That FICOM remedy the oversight concerning its RSS feed,
- c. That FICOM give notice directly to the Boards of Directors of all Canadian credit unions, and
- d. That FICOM extend the deadline for public comment to 90 days from the time at which notice would have been received by all stakeholders.

Thank you for your attention to this matter.

Regards,



Liz Warren
Member, Coast Capital Savings Credit Union
lizwarren@governancewatch.ca

Figure 1. Screenshot of FICOM website showing a list of recent news releases.

The screenshot shows the FICOM website's 'Latest News' page. The page features a navigation menu with categories like Real Estate, Mortgage Brokers, Pension Plans, Financial Institutions, C.U. Deposit Insurance, and Enforcement. A search bar is located in the top right. The main content area displays a list of news releases, each with a release date and a subject line. A sidebar on the right contains a menu with links to various sections like Alerts, Useful Links, Fees, and Contact Us.

| Release Date (mm/dd/yyyy) | Subject |
|---------------------------|--|
| 03/15/2017 | Pension Stakeholder Forum Event Material |
| 03/01/2017 | News Release Call for public comment: B.C. credit union seeks to exit provincial regulation |
| 02/24/2017 | CMBA Conference Remarks by Acting Registrar of Mortgage Brokers at CMBA-BC 2017 Conference |
| 02/14/2017 | Notice of Application Credit Union application for consent to continue from British Columbia |
| 01/25/2017 | Letter to Board Chairs/CEOs/General Managers, British Columbia Credit Unions Update on the Proposed CUDIC Risk Based Premium Assessment Methodology |
| 01/19/2017 | Letter to British Columbia (BC) Trust Companies and Non-Federally Regulated Extraprovincial Trust Companies Adoption of OSFI Guidelines |
| 01/17/2017 | Pensions Bulletin Transfer Options for Lump Sum Payment |
| 01/16/2017 | Letter to All CEOs/General Managers of British Columbia Credit Unions B.C. Liquidity Coverage Ratio Issued for Consultation |

Figure 2. Screenshot of FICOM website showing a list of recent RSS postings. There is an approximate, but not exact, correspondence with the previous list of news releases.

People who rely on the RSS feed to receive notification of FICOM news releases would not have received notification of the March 1, 2017 “call for public comment,” which appears in Figure 1 but not here.

