

**From:** [Heather Demint](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Credit Union MBL Cap Proposal  
**Date:** Tuesday, February 14, 2012 10:15:16 AM

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Hello. I would like to express my concern over the proposal that credit unions be limited to 25% of their net worth in regards to participation loans with one credit union originator. These are safe and profitable loans for credit unions. Our credit union, alone, has an average return on these of 6.00% and NO DELINQUENCY. Definitely cannot say this about vehicle loans. Plus, it is becoming more and more difficult for credit unions to capture vehicle loans with the competitive offers from lenders like Ford Motor Credit and Ally Bank. Vehicle loans used to be the main source of credit union income and, since the competitiveness of this market has evolved, credit unions have struggled to find other ways to thrive. Member Business Loans are one of these avenues. Unlike other financial institutions, credit unions have tried to avoid raising fees and charging members for general services. Instead, we are trying to offer members new services that they might, otherwise, have difficulty finding. We ask that you do not limit our ability to do so. Thank you for your consideration.

*Sincerely,*



*Heather DeMint*

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