

From: [Clark, Joe](#)
To: [Regulatory Comments](#)
Cc: [Schaefer, Marcus](#)
Subject: Truliant Federal Credit Union comments on Proposed Rule on Loan Participations
Date: Tuesday, February 21, 2012 5:44:55 PM

February 21, 2012

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

Re: Proposed Rule on Loan Participations

Dear Ms. Rupp:

I am writing on behalf of Truliant Federal Credit Union in response to NCUA's proposed rule on loan participations. Truliant Federal Credit Union is a \$1.4 billion multiple common bond credit union serving over 180,000 members in and around North Carolina.

Truliant is joining the growing list of other credit unions to urge NCUA to withdraw or start over with the rule making process for loan participations. Truliant does not currently buy or sell loan participations, but is concerned that the proposed rule, if made final, would inhibit credit unions from using loan participations as a risk management and growth tool. As other commentators have stated, this appears to be a regulation in search of a problem.

We appreciate the efforts made by NCUA thus far in the rulemaking process and hope that the comments provided from Truliant and other credit unions will further enhance the process. Please call me at (336) 659-1955 if you have any questions.

Sincerely,

/s/ Marcus Schaefer
President and CEO
Truliant Federal Credit Union