

July 17, 2015

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

RE: Comments on Proposed Rulemaking for Part 723; RIN 3133-AE37

Dear Gerald Poliquin,

I am writing on behalf of Clark County Credit Union, which serves local government employees, medical professionals, and other select groups. We have 34,000 Members and \$550 million in assets. Clark County Credit Union appreciates the opportunity to provide the comments to the National Credit Union Administration (NCUA) on its proposed amendments to the member business lending regulation.

The proposed changes to a principle-based rule are clear and understandable. The proposal provides insight into NCUA's desire to provide sound credit administration strategies. The changes will provide greater flexibility in making business loans as we continue to focus our efforts on good credit administration rather than ratios that provide little risk management. Credit administration is important to the success of a good business lending program. When those strategies are applied to loans that do not require them, resources that could be applied in making good business loans are unnecessarily misdirected.

I support the proposed rules as presented. They will provide for increased business lending and better credit administration. These changes are positive for credit unions in general as they seek to continue to meet the needs of all of their members' through business lending.

Thank you for the opportunity to comment on the proposed rule and for considering my views.

Sincerely,

Matt Kershaw
Chief Executive Officer
Clark County CU

cc: CUNA, CCUL