August 06, 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,

Introductory paragraph:

I am writing on behalf of School Employees Credit Union of Washington, which serves over 81,000 members and currently has assets over $1 billion. School Employees Credit Union appreciates the opportunity to provide comment to the National Credit Union Administration (NCUA) on its proposed amendments to the member business lending regulation.

We believe the proposed change to a principle-based rule is understandable and clear. It will allow us to focus on credit administration rather than monitoring the program with ratios that provide little risk control. The proposal as presented will allow for not only an increase in business lending production but improve service to our membership.

These changes as presented are a positive steps and School Employees Credit Union supports NCUA's recommendation.

Thank you for the opportunity to comment on the this Proposed Rule and for considering our views on the proposed MBL rule.

Sincerely,

Douglas Grout
VP-Lending
School Employees CU of Washington

cc: CUNA, CCUL