

From: [Donna Formanek](#)
To: [Regulatory Comments](#)
Subject: Comment Letter on Proposed Amendments to MBL Part 723
Date: Tuesday, August 18, 2015 12:10:05 PM

Dear Secretary of the Board Poliquin,

Dear Mr. Poliquin,

I work directly with small business members and feel it is very important to keep credit unions strong so they can continue to help these members. I have been reading through some of the proposed changes to Part 723 and have a few comments.

The new flexibility in permitting limited guaranties is a better alternative for some borrowers and provides for a better structure when there are several owners.

If there is to be reclassification of an MBL versus a Commercial Loan, this information needs to be a little clearer so that the Call Report will be manageable.

I was hoping to see some flexibility on Prepayment Penalties due to the fact that much more time (months) and expense go into an MBL; without any prepayment there is no recoup of these costs.

Thank you for your time!

Sincerely,

Donna Formanek
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