

From: [Karen Lantz](#)
To: [Regulatory Comments](#)
Subject: Karen Lantz—Comments on Proposed Rulemaking for part 723
Date: Tuesday, August 18, 2015 4:06:37 PM

August 18, 2015

Gerard S. Poliquin
electronic mail to:
Secretary of the Board
regcomments@ncua.gov
National Credit Union Administration
1775 Duke Street,
Alexandria, Virginia 2231403428

Sent via

RE: RIN 3133-AE37; Comments on Proposed Rulemaking for Part 723 – Member Business Loans; Commercial Lending.

Dear Mr. Poliquin,

On behalf of United Methodist First Choice FCU, I appreciate the opportunity to provide comment to the National Credit Union Administration (NCUA) with regard to the proposed amendments to Part 723 – Member Business Loans; Commercial Lending.

We are considered a small Credit Union of approximately \$4.5 million in Assets, and 1,115 members. We are Common Bond for United Methodist Church entities in the three-state area of SD, ND and MN.

We have been providing MBL loans to our member Churches since 2004. We have made 61 MBL loans for over \$16 million. Our smaller size limits us to loans of \$1 million of which we can keep up to \$100,000 in-house and sell the rest on Participation. Our MBLs have averaged \$262,295 each.

We have demonstrated excellent underwriting and procedures from our Staff and the Participants, and have NEVER had an MBL Church Loan become delinquent. We have never had an MBL loss. Like most Credit Unions, we have a close relationship with our members.

We request approval of the proposed rule to amend MBL #723 regulation. These proposed regulations would provide more flexibility in our program. The proposed rule stresses safety and soundness while providing modernization of regulatory requirements.

Thank you very much.
Sincerely,
Karen Lantz, President
United Methodist First Choice FCU
Charter #18057