

August 18, 2015

National Credit Union Administration
1775 Duke St.
Board Secretary
Alexandria, VA 22314

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

Dear Gerard Poliquin,

I am writing on behalf of CRC Federal Credit Union, which serves employees of the California Department of Corrections and Rehabilitation in Southern California. We have 1,961 Members and \$9.6 million in assets.

CRC FCU appreciates the opportunity to provide the comments to the National Credit Union Administration (NCUA) on its proposed amendments to the member business lending regulation. We support NCUA's efforts to modernize the MBL regulation, which would give credit unions much needed flexibility in running an MBL program.

Although we do not participate in a Member Business Lending program I feel it is important for credit union's to have the flexibility to build a program that will support their members' business lending needs. We commend the NCUA Board on the following proposed changes:

- Allowing a 1-4 family residence to not be considered a MBL.
- Allowing purchased business participations to not be counted as MBLs.

Again, we support the NCUA's efforts to modernize the MBL rule. Thank you for the opportunity to comment on this proposed rule and for considering our views.

Sincerely,

Rosie Zarubick
CEO
C.R.C. FCU

cc: CUNA, CCUL