

From: [Lynette Leonard](#)
To: [Regulatory Comments](#)
Cc: syashewski@cornerstoneleague.coop
Subject: Comments on Proposed Rulemaking for Part 723
Date: Tuesday, August 25, 2015 2:22:22 PM
Attachments: [image001.png](#)

August 25, 2015

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

RE: Comments on Proposed Rulemaking for Part 723

Dear Gerard Poliquin,

Thank you for the opportunity to comment on the NCUA's proposed changes to the rules and regulation impacting member business loans. I am writing on behalf of Allegiance Credit Union which serves members in the Oklahoma City, Oklahoma community. We currently have 28,000 members and \$250M in assets.

We believe the proposed changes are certainly reasonable and seek to eliminate unnecessary regulatory burdens on both the credit union community and NCUA.

We support allowing a 1-4 family residence to not be considered a MBL, allowing a vehicle loan to a small business owner to be classified as a personal loan, the elimination of the requirement to demand a personal guarantee in all instances and allowing purchased business participations to not be counted as MBLs. All of these changes are very positive in terms of allowing credit unions to assist members in meeting their financial goals and aspirations.

We believe the proposed changes are easy to understand and administer, by both our credit unions and the examiners. The changes are commonsense based and in alignment to what would be very common in the world of business lending.

The NCUA is to be applauded for its proposal to ease the regulatory burden facing credit unions lending to small businesses. ACU believes these changes are a step in the right direction toward making sure credit unions can fully serve their members and communities. Thank you for the opportunity to comment on the proposed rule and for considering our views.

Sincerely,

Lynette Leonard
President/CEO
Allegiance Credit Union

Lynette Leonard

President/CEO

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