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Public Comments on Member Business Loans; Commercial Lending: =====

Title: Member Business Loans; Commercial Lending

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First Name: Robert

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Comment: I am the CEO of Advantis Credit Union located in Milwaukie, Oregon.

Advantis is a State Chartered institution with \$1.2 billion dollars in assets and \$114 million in member business loans and commercial participations.

Advantis is very supportive overall of the MBL proposal and would like to thank all three NCUA Board Members for offering input that substantially improved the draft proposal. The proposed rule will allow credit unions to more effectively manage business loan origination and portfolios.

One provision of the proposed rule does cause concern for Advantis is the elimination of state MBL rules as well as the ability of states to apply to have their own MBL regulation. Oregon has a strong State Supervisory Authority with a tradition and commitment to updating their charters and improving the regulatory framework on an annual basis. It is also one of seven states that have their own state-specific MBL rule. State-specific MBL rules helped Oregon credit unions weather the 2008 Wall Street banking crisis and proved how they excel in sound lending and risk management practices.

We ask that the NCUA remove from the commentary on State Regulation of Business Lending that indicates state supervisory authorities do not have the ability to interpret their own MBL rules granted by the NCUA board in relation to the Federal Credit Union Act. It is imperative that States be allowed to maintain previously adopted state rules and to retain the ability to update or submit new state rules to the NCUA Board for approval. We are specifically asking that the NCUA not make any adverse changes to part 741. The current proposal includes a change to part 741.203 that would eliminate an important state carve out that must be maintained.

Credit Unions, like all providers of financial services are facing a massively disruptive future as technology and non-bank lenders threaten both sides of our balance sheets. The increased ability to compete in an increasingly competitive market place is crucial for our institutions, and the movements, survival. Credit Unions are uniquely positioned to offer business loans to under-served and minority small businesses where others have abandoned those markets.

Thanks you for your consideration.

President / CEO

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