



August 26, 2015

Gerard Peloquin  
Secretary to the NCUA Board  
1775 Duke Street  
Alexandria, VA 22314-3428

RE: Comment Letter on the Proposed Amendments to NCUA's MBL Rule

Dear Mr. Peloquin,

I have reviewed the proposed rules from the NCUA regarding changes to the Member Business Loan (MBL's) regulations. I support several of the proposed changes including the loan-to-value requirements, removing the personal guarantees, the construction and development limits, and the unsecured lending limits.

Gesa Credit Union has been actively making MBL's for over 7 years. We have supported many local businesses with their financial needs when many banks in our market place stopped lending during the recent recession. As a result of our successful MBL efforts, we are concerned about the cap on MBL's and our opportunity for future growth.

Gesa is a Washington State chartered credit union and it is our desire that the NCUA not adversely change or restrict the ability of Washington's State regulatory body to evaluate and manage state chartered credit unions. The current proposal includes changes that may eliminate the state's authority to evaluate and manage waivers. Washington's DFI is familiar with state credit unions, has a great working relationship with them, and appropriately focuses on safety and soundness issues when conducting exams.

Thank you for your consideration.

A handwritten signature in blue ink, appearing to read "B. Jorgenson", with a long horizontal flourish extending to the right.

Brett Jorgenson  
Chief Lending Officer  
Gesa Credit Union