Park View
FEDERAL CREDIT UNION

1675 Virginia Avenue, Harrisonburg, VA 22802 • www.pvfcu.org
540-434-6444 • 888-900-6444 • Fax: 540-433-0108

August 26, 2015

Mr. Gerard Poliquin,
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

AUG28'15 AM 7:42 BOARD

Re: Comments on Notice of Proposed Rulemaking for Part 723; RIN 3133–AE37

Dear Mr. Poliquin:

Park View Federal Credit Union appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the member business lending (MBL) regulation.

We support NCUA's efforts to modernize the MBL regulation, which would give credit unions much needed flexibility in running and managing an MBL program. We appreciate that the new regulations will be more in line with the Federal Credit Union Act and its purview. While there will be additional training for board members, we feel it is a fair trade off for the flexibility to develop our program in a way that is unique to us.

We would encourage the NCUA to consider allowing Credit Unions to begin implementing the changes resulting from the updated regulations as soon as they can reasonably do so. While some credit unions will have significant adjustments to make, many can make straightforward changes to their practices, which will have a material impact on their program. A few examples would be a risk rating system, the new definitions under Construction Loans, Personal Guaranty requirements and unsecured lending limits.

We do have a few concerns as this process moves forward. The first is we would appreciate more clarification on the differences between a "commercial" loan and a MBL. This incorporated into the rules, or in part 723.1 Definitions; *Examples*. The second concern we have is how these new regulations will be handled by examiners. By going to a principle base, instead of a prescriptive base, there will be a significant burden on examiners to be sufficiently trained to evaluate a credit union's commercial lending program. We encourage you to consider an examination approach using "Subject Matter Expert Examiners" for the MBL/Commercial examinations over general training for your entire examination staff.

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,

John Beiler
President/CEO