

PUBLIC SUBMISSION

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General Comment

As a credit union with approximately \$20MM in Member Business Loans (MBLs) currently outstanding, Alliance Credit Union is eagerly anticipating the changes addressed in the proposed regulation. Everyday our members benefit from MBLs that help them run their business. By lending to prospective businesses we are helping the communities we serve, which is the crux of the credit union effort. It would be beneficial to both the credit unions and businesses should the proposed regulation be adopted. Credit unions, including ours, have extensive experience in this area and this regulatory relief would be met in high regard.

Specifically, being able to waive the necessity for a personal guarantee and removing explicit loan-to-value requirements would help Alliance continue to fund business ventures, expansion, and day-to-day expenses. We continue to fight with banks on a continual basis, and the proposed regulation allows us to compete on more of a level playing field for MBLs. The proposed regulation gives both increased flexibility and opportunity to Alliance Credit Union and credit unions alike.

In summation, Alliance Credit Union welcomes the proposed changes to the MBL rule and is keen on the NCUAs efforts to continue to help credit unions serve their business members.