



Gerard S. Poliquin  
Sent via electronic mail to:  
Secretary of the Board  
[regcomments@ncua.gov](mailto:regcomments@ncua.gov)  
National Credit Union Administration  
1775 Duke Street, Alexandria  
Virginia 22314-3428

RE: RIN 3133-AE37; Comments on Proposed Rulemaking for Part 723 - Member Business Loans; Commercial Lending

Dear Mr. Poliquin,

On behalf of Capital Credit Union, thank you for the opportunity to comment on the recent proposal regarding amendments to Part 723 – Member Business Loans; Commercial Lending.

Capital Credit Union proudly serves 30,000 members across the State of North Dakota, with branch offices in Bismarck, Mandan, Hazen, Beulah, New Salem, and Fargo. Our overall loan portfolio as of July 31, 2015 is \$324 million strong. Our member business loan portfolio is \$82 million and is well-balanced and diversified. We have an experienced business lending team with a deep understanding of the risks involved with business lending.

I am in favor of and support the proposed rule and believe it will provide credit unions with more flexibility and allow us to be more agile in a highly competitive market; specifically, the elimination of the need for waivers for C&D limits and aggregate limits to one member or group of associated members. The principle based approach also lends itself to greater flexibility while maintaining prudent risk management practices, supported by sound policies established on an individual credit union basis centered on meeting the needs of the membership.

Thank you for the opportunity to comment.

Sincerely,

Steven A. Davis  
Chief Lending Officer  
Capital Credit Union