

August 31, 2015

National Credit Union Administration
1775 Duke St.
Board Secretary
Alexandria, VA 22314

RE: Comments on Proposed Rulemaking for Part 723; RIN 3133-AE37

Dear Gerard Poliquin,

We support the direction NCUA has taken with this proposal and commend the Board and staff for their efforts. Thank you for providing Seven Seventeen Credit Union the opportunity to comment on this proposal and for your consideration of our comments.

Many of the one-size-fits-all rules unnecessarily burdens and adversely impacts credit union competitiveness. We support the Board's proposal to eliminate the two-year experience requirement. Evaluating the knowledge, skills and experience of the professionals involved in Member Business Lending makes more sense than regulating based on an arbitrary number of years of experience.

We believe there is significant demand for credit from small businesses. Increasing the cap on credit union business lending would almost certainly lead to an increase in SBA guaranteed lending. This means that more small businesses will have access to credit to start or grow their business, and create jobs.

We support the proposed adjustments in the MBL calculation. The proposed calculation meets the Federal Credit Union Act's requirements while removing an unnecessary provision.

We like the fact that the proposed rule would switch to a principles based MBL regulation. This change modernizes the regulation by giving credit unions flexibility to develop MBL programs to best fit their members' needs.

We also enthusiastically support the removal of the waiver process as it seriously impacts member service and needlessly places credit union at a severe competitive disadvantage.

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,

Brett Carnahan
Commercial Loan Officer
Seven Seventeen CU Inc

cc: CUNA, CCUL