

Monday, August 31, 2015

Sent via Email: regcomments@ncua.gov

Gerard S. Poliquin, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria Virginia 22414-3428

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

Dear Mr. Poliquin:

I am writing in support of the proposed amendments to Part 723, Member Business Loans (MBLs) on behalf of the 12,567 members of the Texoma Community Credit Union (TCCU) in Wichita Falls, Texas TCCU commends NCUA for easing the government overreach on MBLs.

I personally have over 30 years of experience in the credit union movement with humble beginnings as a part-time teller while in college to a CEO for over 20 years. I have first-hand experience relating to Member Business Lending as a loan officer and later as a Chief Executive Officer. I have referred more commercial business loans than I care to think about to local banks due to the fact that I was not allowed to serve their commercial financial needs although I could fulfill their personal financial needs.

I support the proposed shift from a prescriptive member business lending regulation to a principles-based regulation that provides additional flexibility to credit unions. Lending for business purposes has always been consistent with the credit union's mission to promote thrift and provide access to credit. Small businesses rely on credit unions for access to loans while banks ignore this segment of the community.

This new rule will not only benefit TCCU to allow us to create, develop, grow and manage a commercial loan program but will benefit the entire Credit Union movement. We will be able to classify loans that will not force us to stop lending when we reach the politically established 12.25% CAP.

Finally the new NCUA proposed rule will allow credit unions to write logical MBL policies. Lastly, the new rule delegates back to the Board the authority it rightly deserves.

Thank you for the opportunity to comment on this very important issue. Please feel free to contact me at (940) 851-4042 with any questions or I can be of further assistance.

Yours sincerely,



John Buckley
Chief Operations Officer