

Sent Via Email: [regcomments@ncua.gov](mailto:regcomments@ncua.gov)

Gerard S. Poliquin, Secretary of the Board  
National Credit Union Administration  
1775 Duke Street  
Alexandria, Virginia 2214-3428

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

Dear Mr. Poliquin:

I am writing in support of the proposed Rulemaking for Part 723, Member Business Loans (MBLs) on behalf of the 12,557 members of the Texoma Community Credit Union (TCCU) in Wichita Falls, Texas. TCCU commends NCUA for easing the government overreach on MBLs.

To date, TCCU has not taken a single penny of loss on MBLs. It is clear our members respect and enjoy the opportunity to obtain business loans that banks will not offer. It is abundantly obvious that the management and staff of TCCU know how to underwrite and manage MBLs.

We recently reengaged in MBL by hiring a former Business Lending Banker to assist in Underwriting. At the same time TCCU we engaged the help of Credit Union Business Group (CUBG), a CUSO which specializes in MBL work. CUBGs underwriting is very well recognized by NCUA as a leader in MBL underwriting.

TCCU is now engaged in MBL lending and we agreed with the proposed Rulemaking for Part 723, Member Business Loans. After our review of the proposed new rules **TCCU generally supports the Rule.**

The new NCUA proposed rule will allow Credit Union to write logical MBL policies. The new rule will delegate back to the Board the authority it rightly deserves.

Yours sincerely,

Manny Puga  
Business lending Director