

August 21, 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,

Thank you for the opportunity to comment on the NCUA's proposed changes to the rules and regulations impacting member business loans. KEMBA Financial Credit Union, based in Columbus, Ohio is a federally insured state chartered credit union. Currently we serve the Central Ohio community via a community charter. We have 81,500 Members and \$970 million in assets.

We believe the proposed changes are certainly reasonable and seek to eliminate unnecessary regulatory burdens on both the credit union community and the NCUA itself.

Specifically, we support allowing a 1-4 family residence to not be considered a MBL, allowing a vehicle loan to a small business owner to be classified as a personal loan, the elimination of the requirement to demand a personal guarantee in all instances, and allowing purchased business participations to not be counted as MBLs.

In addition, as an Ohio based state chartered credit union, our rules at times conflict with those prescribed by the NCUA. As a member of a business loan CUSO, Cooperative Business Services (CBS), which serves both federally and state chartered credit unions, eliminating the need to seek waivers, on what could be deemed routine business loan matters, makes great sense to us.

We believe the proposed changes are easy to understand and administer, by both our credit unions and the examiners. Said, very simply, we believe the proposed changes are common sense based and in alignment to what would be very common in the world of business lending.

This proposed rule change represents impactful and real regulatory relief and I applaud you. Again, we support the NCUA's efforts to modernize the MBL rule and look forward to additional changes to other areas where common sense based changes that benefit credit unions and ultimately our members can be applied.

Thank you for the opportunity to comment on this proposed rule and for considering our views.

Sincerely,

Gerald Guy
President/CEO
KEMBA Financial CU Inc

cc: CUNA, CCUL