

August 06, 2015

National Credit Union Administration  
Gerald Poliquin, Secretary of the Board  
1775 Duke Street  
Alexandria, VA 22314-3428

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

Dear Gerald Poliquin,

I am writing on behalf of Reliance Federal Credit Union which serves utility employees. We have 2000 Members and \$24 million dollars in assets. Reliance FCU appreciates the opportunity to provide the comments to the National Credit Union Administration (NCUA) on its proposed amendments to the member business lending regulation.

Do you believe that the switch from a prescriptive rule to a principle-based rule will provide you more flexibility in making business loans? Yes. Our members are looking for us to provide these services and we cannot under the current legislation.

Will the adjustments in the calculations of loans that count for the MBL statutory cap assist your credit union in making more MBLs? Yes

Does the proposed rule provide you with sufficient clarity to know what will be required in your policies/procedures? the proposed rule will enhance our current policies/procedures.

Are you comfortable that your examiner will be able to examine your portfolio and policies utilizing a principle-based rule? No

Does the removal of the waiver process benefit your MBL program? Yes

Does the distinction between commercial loans and member business loans benefit your MBL program? Yes

Will your credit union need to create a credit risk rating system or credit grading system in order to comply with the proposed rule? Already have one in place.

We need this legislation now. It has been a long time coming.

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

Sincerely,

Susan Chally  
President/CEO  
Reliance FCU

cc: CUNA, CCUL