



PO Box 1234  
822 Commerce Avenue  
Longview, Washington 98632

AUG07'15 AM 7:30 BOARD

July 31, 2015

NCUA Board  
1775 Duke Street  
Alexandria, Virginia 22314-3428

Re: Proposed Rule Changes for MBL Regulations

Dear Chairman Matz, Vice Chairman Metsger and Board Member McWatters,

Thank you each for taking time to address this critical issue of Member Business Lending for credit unions. I deeply appreciate your championing the efforts to reform these regulations and offering your input which will have the effect of substantially improving the draft proposal.

While we at Fibre Federal Credit Union operate under a federal charter, we recognize our peer state chartered credit union colleagues, particularly here in the state of Washington, have enjoyed the benefits of rules and regulations adopted by our Department of Financial Institutions as allowed under Part 741. We encourage the Board to not make any adverse changes to this rule, specifically concerning Part 741.203.

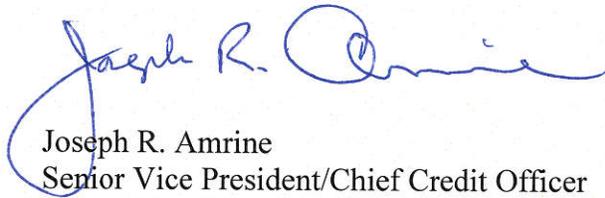
I want to also express my thanks for the Board's work on removing the list of prescriptive limits, definitions and waivers listed below:

- The requirement for a personal guarantee;
- The 80% limit on loan to value ratios;
- The limit on unsecured MBL's;
- The requirement that staff have two years of direct experience;
- Detailed limits on construction and development loans;
- The restrictive definition of "associated borrower;" and
- The 15 percent of net worth limit on loans to one borrower, which will now increase to 25 percent if the additional 10 percent is supported by readily marketable security.

These changes will have an immediate positive impact on our ability to serve our business members and be more competitive with national and community banks in our market areas while at the same time not compromise our safety and soundness.

I am available to answer any questions you might have concerning how these changes will affect us at Fibre Federal Credit Union. My contact information is outlined below.

Sincerely,



Joseph R. Amrine  
Senior Vice President/Chief Credit Officer  
Fibre Federal Credit Union  
796 Commerce Avenue Suite 200  
Longview, WA 98632  
Office Phone: 360-414-4218  
Fax: 360-414-4202  
[jamrine@fibrecu.com](mailto:jamrine@fibrecu.com)