

August 14, 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 Fort Worth City Credit Union, which serves the City of Fort Worth employees. We have about 13,000 Members and \$160M in assets. FWCCU appreciates the opportunity to provide the comments to the National Credit Union Administration (NCUA) on its proposed amendments to the member business lending regulation.

Due to our limited field of membership, we have a small demand for business loans. We do offer business loans in case a fireman or police officer (for example), has a personal business as a side job. Even though the current rules have not affected us in making these loans, there are many community credit unions that have been held back.

The fact the credit unions are currently more restricted than other financial institutions in business lending only shows that its own regulator/insurer does not believe in our abilities to successfully manage the business, which only reinforces the opposition of competitors. So any removal of additional restrictions is a positive move for the industry as a whole. Removing the requirement of a personal guarantee alone is very positive. I know I would not want to personally guarantee a loan to our credit union and I would go somewhere else if that were required.

Thank you for taking the initiative to modernize the MBL rule, and thank you for the opportunity to comment on the this Proposed Rule and for considering our views.

Sincerely,

Ron Fox
President
Fort Worth City CU

cc: CUNA, CCUL