

**From:** [Jeff Meyer](#)  
**To:** [Regulatory Comments](#)  
**Cc:** [akleinschmit@cuad.coop](mailto:akleinschmit@cuad.coop); [Denton Zubke - DAKOTA WEST](#)  
**Subject:** Jeff Meyer/Dakota West - Comments on Proposed Rulemaking for Part 723  
**Date:** Tuesday, August 18, 2015 5:23:36 PM

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August 18, 2015

Gerard S. Poliquin  
Secretary of the Board  
National Credit Union Administration  
1775 Duke Street, Alexandria  
Virginia 22314-3428

RE: RIN 3133-AE37; Comments on Proposed Rulemaking for Part 723 – Member Business Loans; Commercial Lending

Dear Mr. Poliquin,

I, on behalf of Dakota West Credit Union, appreciate the opportunity to provide comment to the National Credit Union Administration (NCUA) with regard to the proposed amendments to Part 723 – Member Business Loans; Commercial Lending.

Dakota West has primarily provided agricultural loans to our 9,000 members in western North Dakota since 1941. With assets of nearly \$260 million we operate 9 branch locations serving only small, rural communities. Since its founding Dakota West has been focused on providing the hard working members in our markets with the credit needed to operate and grow their farms and ranches. Historically we have been able to do this with credit losses that have averaged less than 2 basis points (.0179%) over the last five years. Of our \$170 million loan portfolio roughly 83% of the total are currently classified as business loans.

I wholeheartedly support NCUA's proposed rule that will provide more flexibility and reduce the regulatory burden so we may more effectively and efficiently serve our communities and the residents of western North Dakota. While we currently do not fall under the aggregate member business lending limit there are still a number of significant positive changes for us in the proposed regulation. In particular the flexibility to exceed the single obligor limit with readily marketable collateral will allow us to hold more of our own loans in the portfolio and rely less on participating lenders. Removing the current limit on construction & development loans will allow us further diversification and lifting the requirement for personal guarantees without having to obtain a waiver will also be extremely beneficial.

Thank you for this opportunity to share our comments and concerns.

Sincerely,

**Jeff Meyer**

**CEO**

**Dakota West Credit Union**

**PO Box 1496, Watford City, ND 58854**

**701.444.6484 (p)**

**701.444.3286 (f)**

**[jeffm@dakotawestcu.org](mailto:jeffm@dakotawestcu.org)**

Dakota West Credit Union

Watford City, ND 58854

[www.dakotawestcu.org](http://www.dakotawestcu.org)

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