

August 31, 2015

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

Sent via electronic mail to:
regcomments@ncua.gov

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

Dear Mr. Poliquin,

On behalf of Town & Country Credit Union, I would like to thank you for the opportunity to express our views on the recent proposal by the NCUA Board addressing the Member Business Lending (MBL) rules of the National Credit Union Administration in Section 723.

I have read the comment letter from NACUSO and proposed comments by CUNA and agree with both of them, so instead of reiterating those comments I will be brief.

I am very much in favor of the proposed Member Business Lending changes. While Town & Country Credit Union is already grandfathered in and not subject to the cap on Member Business Lending, several of the proposed common sense changes will be beneficial not only to us, but all credit unions.

In particular, the aggregate member business lending limits, construction and development rules, the collateral and security requirements and the associated borrower definition allow for the flexibility that is needed.

Town & Country Credit Union presently is the holder of several waivers that have been provided that will no longer be required under the proposed rule.

Thank you for this opportunity to comment.

Sincerely,



Darrell Olson
CEO / President