

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,

As Senior Vice President of Business Lending at Town & Country Credit Union in Minot, ND I 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.

We have always been of the understanding that this regulation is too rigid and would like to see the parameters widen to create more flexibility for our credit union and all credit unions alike.

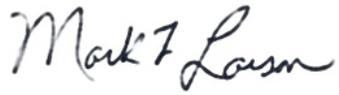
Town and Country Credit Union was established in 1939 for the purpose of providing savings and loans to farmers and community members in the Ward county area of North Dakota. Our main branch is located in Minot, ND which has a population of approximately 42,000 people. We also have branch locations in Fargo, Kenmare, Stanley and Ryder North Dakota. Town & Country Credit Union has experienced consistent growth over the years in the range of 5 to 10 percent annually. As of month end July 2015, TCCU has total assets of \$368 million with a loan portfolio funded at 105% of deposits. Member Business Loans continue to be the leading loan bracket for TCCU. Yearend balances show continued growth in this area. On December 31, 2010 Member Business Loans were \$127 million. At year end 2014 Member Business Loans were \$244 million. This is a ninety-two percent increase of \$117 million over a four year span.

TCCU has veteran business lenders and managers. We have four lenders / managers with business lending experience in excess of 30 years each for total years of service exceeding 120 years. We are complimented by an educated and seasoned staff of lenders and processors.

TCCU has policies and procedures in place that address safety and soundness in our Member Business Loan portfolio. We will support any and all changes to the rule which will provide more flexibility so that all credit unions can better service their members and communities.

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

Sincerely,

A handwritten signature in black ink that reads "Mark Larson". The signature is written in a cursive style with a large, stylized 'M' and 'L'.

Mark Larson  
Senior Vice President, Business Lending