

August 24, 2015

National Credit Union Administration  
1775 Duke St.  
Board Secretary  
Alexandria, VA 22314

RE: Comments on Proposed Rulemaking for Part 723; RIN 3133-AE37

Dear Gerard Poliquin,

Ladies and Gentlemen:

I am writing on behalf of Central City Credit Union, which serves several counties and communities in central Wisconsin. We have approximately 23,000 Members and \$215 million in assets. Central City Credit Union appreciates the opportunity to provide the comments to the National Credit Union Administration (NCUA) on its proposed amendments to the member business lending regulation.

We currently offer our members business loans for a variety of reasons, but the program has been very successful for our credit union and the communities and business members we serve. In addition, we have nominal write offs in our business lending portfolio and have found it to be a safe, sound product to offer our members.

The proposed rule would switch from a prescriptive to a principles based MBL regulation. This change modernizes the regulation by giving credit unions flexibility to develop MBL programs to best fit their members' needs. A principles based regulation in some instances can complicate the running of an MBL program for credit unions, as management and boards of directors will bear a greater responsibility in developing and maintaining an MBL or commercial lending program that is safe and sound. However, we think this change is a fair trade off for the flexibility.

There are many small entrepreneurs and other small business activity that do not have adequate access to small business loans from other financial institutions in order to run their business and contribute economically to their communities. The proposed changes to the MBL, including allowing a 1-4 family residence to not be considered a MBL, allowing a vehicle loan to a small business owner to be a personal loan, and allowing purchased business participations to not be counted as MBLs, are very positive in terms of allowing credit unions to assist members in meeting their financial goals and aspirations.

Again, we support the NCUA's efforts to modernize the MBL rule. Thank you for the opportunity to comment on this proposed rule and for considering our views.

Sincerely,

Darlyne Keller  
VP-Administration  
Central City Credit Union

cc: CUNA, CCUL

