



AUG21'15 PM 1:42 BOARD

August 17, 2015

National Credit Union Administration  
Gerald Poliquin, Secretary of the Board  
1775 Duke Street  
Alexandria, VA 22314-3428

RE: Gerald Poliquin,

I am writing on behalf of Community 1<sup>st</sup> Credit Union (C1st), which serves 57 counties in central and southern Iowa and 8 counties in Northern Missouri. We have 55,000 members and \$540 million in assets. C1st 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 believe the switch from a perspective rule to a principle-based rule will allow for more flexibility when considering LTV and equity contribution requirements. Borrowers would be evaluated using global underwriting conditions without the need for statutory waivers. This would streamline processes and provide better member service.

The MBL cap as a percentage of net worth would allow credit unions to provide more members with the loan services they need as long as our risk based capital permits. This would not have an immediate impact on C1st as we already have our low-income designation with no cap on MBL. This as well as the adjustments in the calculations of loans that count towards MBL caps certainly will open things up for future lending.

We believe the NCUA examiners will be able to monitor and evaluate the new processes without any difficulties. The agency has been moving in this direction previously and has pushed for many of the provisions included in this new rule such as improved credit risk rating systems.

C1st will need to revise our credit risk rating system. We will adjust it to make sure all requirements of the new rule are addressed.



C1st believes that these changes are necessary not only for what we have planned for our growth but for the growth of the industry and economy as well.

Thank you for the opportunity to comment on this Proposed Rule and for considering our views on the proposed MBL rule.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jeffrey P. Rose'.

Jeffrey P. Rose  
President & CEO  
Community 1<sup>st</sup> Credit Union

CC:CUNA, CCUL