

August 25, 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,

I am writing on behalf of Essex County Teachers Federal Credit Union, which serves employees of Boards of Education in Essex County, New Jersey, and their family members. We have 2,600 members and \$14 million in assets. I appreciate the opportunity to provide the comments to the National Credit Union Administration on its proposed amendments to the member business lending regulation.

I believe that the switch from a prescriptive rule to a principle-based rule will provide credit unions more flexibility in tailoring their business lending programs to their members' needs. It does concern me, however, that the examination guidelines may have the effect of reinstating the prescriptive rules. I think it's important that NCUA share that guidance with the credit union industry and allow for credit union input before finalizing it. As with any new rule there will be differences in interpretation and a learning curve for both examiners and credit unions. I urge NCUA to allow for these in the guidance it provides

The adjustments in the calculations of loans that count for the MBL statutory cap should make it possible for credit unions to make more MBLs. This is a good thing for credit unions and for our members.

The new distinction between commercial loans and member business loans puts the emphasis back where it should be: making safe and sound loans to our members.

Over all I believe this new rule will be good for the industry and its members.

Thank you for the opportunity to comment on this Proposed Rule and for considering my views on the matter.

Sincerely,

Robert Steeves  
CEO  
Essex County Teachers FCU

cc: CUNA, CCUL