



SOUTH CAROLINA
FEDERAL
CREDIT UNION

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August 25, 2015

Mr. Gerard Poliquin, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

RE: Comments on Proposed Rulemaking for NCUA's MBL Rule, Part 723

Dear Mr. Poliquin,

On behalf of South Carolina Federal Credit Union, I appreciate the opportunity to provide comments on the proposed rule amending Part 723. We support efforts by NCUA to modernize regulations while providing regulatory relief so credit unions can better serve small businesses and our communities.

Credit unions are uniquely positioned to support small businesses in this strengthening economy. As local financial institutions, we can be more responsive, and understand intimately the geographical areas we serve. Additionally, we can fill a real need for businesses that don't meet typical revenue requirements imposed by banks, even community banks. The proposed MBL regulatory relief will allow credit unions to safely and soundly lend to small businesses, growing the local economy and in-turn the national economy. Credit unions have the capital to help America's small businesses thrive. Modifying the credit union member business lending regulation would help provide economic stimulus without costing the taxpayer a dime. Every day small businesses are looking for access to capital. Credit unions can play a bigger role in filling that need with this regulatory relief.

While we appreciate the ability to implement a principle-based policy for our commercial and business lending activities, we would like the opportunity to review and comment on any guidance issued for examiners. It is important for any such guidance to not allow examiners to revert back to the current prescriptive limits and definitions we have to abide by now. This guidance will be key in helping ensure credit unions can support businesses within their communities while maintaining a safe and sound commercial and business lending program and meeting examiner expectations.

Thank you very much for the opportunity to comment on the proposed regulation changes to Part 723 and for considering our comments.

Sincerely,

Trey Gantt
VP Lending