August 25, 2015

Gerard Poliquin *Delivered Electronically*
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

**Subject:** Member Business Loans; Commercial Lending; 12 CFR Part 723; RIN 3133-AE37

Dear Mr. Poliquin,

Meridian Trust Federal Credit Union supports the proposed regulatory changes as presented by the NCUA Board of Directors. The proposed rule will allow credit unions to more effectively manage business loan originations and portfolios. The revisions will also provide needed clarification and consistency on definitions and terms of commercial lending.

**Meridian Trust Federal Credit Union Comments**

Our membership supports - a common sense approach to member business and commercial lending. The industry as a whole experiences better control of the program while providing an invaluable service to the communities in which we belong .

Presently, from the small business owner's perspective, credit unions are limited by parameters that circumvent the credit union's ability to serve more fully and responsibly.

We therefore support;

removing non-statutory parameters outlined in the NCUA proposal;

providing the credit union has sufficient capital; allowing 1.75 times the credit union's net worth.

and, removing specific loan portfolio limits.

**Conclusion**

We appreciate the ability to comment on the proposed member business loan regulations. The proposed regulation supports credit unions' ability to serve their members more fully without exposing the insurance fund to greater risks unnecessarily and updates the MBL system for a more enlightened era in the financial services industry.

Best Regards,

*Kim Withers*

Kimberley A. Withers
CEO