

**From:** [Darla Erb](#)  
**To:** [Regulatory Comments](#)  
**Subject:** Darla Erb -- Comments on Proposed Rulemaking for Part 723  
**Date:** Wednesday, August 26, 2015 5:14:29 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)

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August 26, 2015

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

RE: RIN 3133-AE37; Comments on Proposed Rulemaking for Part 723 – Member Business Loans;  
Commercial Lending

Dear Mr. Poliquin:

On behalf of Voyage Federal Credit Union, I appreciate the opportunity to provide comment to the National Credit Union Administration (NCUA) with regard to the proposed amendments to Part 723 – Member Business Loans; Commercial Lending.

Voyage Federal Credit Union was chartered in 1939 and currently serves our members, the people of Sioux Falls, South Dakota and surrounding communities within Minnehaha and Lincoln Counties. We have \$80 million in assets and 10,032 members. In 2014 we launched our business lending department in order to meet member demands and better serve the needs of small business owners in our communities. We hired a business lender to start the business department, which is overseen by our Chief Operating Officer who has business lending experience as well. Our business loan portfolio has grown to over \$4 million dollars in this past year, which proves to us that there was a great need for business lending here at Voyage FCU.

In addition, the loan participation treatment would help us to broaden our market, allow us to maintain and grow our business lending department rather than shut it down, assist the Credit Union to sell off and then help additional members with their needs. It would be easier for credit unions to operate under the cap and would be helpful to both selling and buying credit unions.

Therefore, I support a proposed rule that will provide more flexibility and reduce the regulatory burden so we may more effectively and efficiently serve our community and membership.

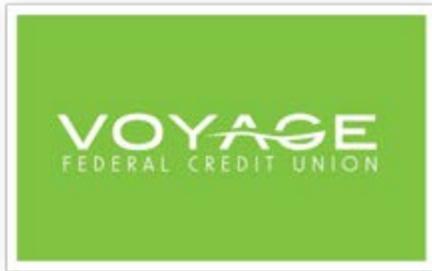
Along with the final rule, we would appreciate the opportunity to receive guidance information as well. Thank you for this opportunity to share our comments and concerns.

Sincerely,

Darla Erb, CEO

**Darla Erb, CCUE**

**Chief Executive Officer**



**Voyage Federal Credit Union**

*Because Every Journey Is Different*

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