

From: [Gallagher, Debra](#)
To: [Regulatory Comments](#)
Subject: Proposed Rule Part 723 - Member Business Loans
Date: Wednesday, August 26, 2015 5:22:35 PM

August
26, 2015

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

Sent via electronic mail to:
regcomments@ncua.gov

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

Dear Mr. Poliquin,

On behalf of Capital Credit Union, I appreciate the opportunity to comment on the recent proposal regarding amendments to Part 723 – Member Business Loans; Commercial Lending.

Capital Credit Union proudly serves 30,000 members across the State of North Dakota, with branch offices in Bismarck, Mandan, Hazen, Beulah, New Salem, and Fargo. We had assets of \$398 million as of July 31, 2015 and a loan portfolio of \$324 million. Our portfolio of business loans totals \$82 million; it performs well and is well diversified. We have an experienced business lending team, led by a Chief Lending Officer and Business Services Manager with combined experience of 40+ years.

I am in favor of and support the proposed rule and believe it will provide credit unions with more flexibility and allow us to be more agile in a highly competitive market; specifically, the elimination of the need for waivers for C&D limits and aggregate limits to one member or group of associated members. The principle based approach also lends itself to greater flexibility while maintaining prudent risk management practices, supported by sound policies established on an individual credit union basis centered on meeting the needs of the membership.

Thank you for the opportunity to comment.

Sincerely,

Debra M. Gallagher
President/CEO
Capital Credit Union



Debra Gallagher
President/CEO

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