



August 27, 2015

Ms. Mary Rupp
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Sent via E-mail to: regcomments@ncua.gov

Re: Heritage USA Federal Credit Union Comments on Proposed Rulemaking for Part 723; RIN 3133-AE37

Dear Ms. Rupp:

This letter represents the views of the Heritage USA's regarding the NCUA's Proposal on Member Business Lending. Heritage USA has a community charter for Midland County and the underserved county of Ector in Texas. We appreciate the opportunity to comment on this very important proposal.

We support NCUA's efforts to offer regulatory relief so that credit unions may better serve their members, both individual members and business members. As a small credit union, we are not currently offering member business loans but we certainly support easing restrictions so that we may consider doing so in the future. In particular, we support the exemption provided for small entities under \$250 million.

As you know, the credit union industry is a primary provider of services to small businesses. This proposal will permit credit unions to better serve their business members.

We understand the statutory limitations imposed on NCUA regarding MBLs and appreciate NCUA's attempt to work within these limits to offer greater flexibility. By taking a principles-based approach, NCUA has crafted a rule that better reflects the spirit of the original statute. We look forward to similar efforts to offer future regulatory relief to credit unions.

Respectfully yours,

A handwritten signature in blue ink that reads "Duane K. Jones". The signature is written in a cursive, flowing style.

Duane K. Jones, LL.M., J.D., M.S.A.
Chief Executive Officer
Heritage USA Federal Credit Union