



## PINE BLUFF COTTON BELT FEDERAL CREDIT UNION

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August 26, 2015  
National Credit Union Administration  
1775 Duke St  
Board Secretary  
Alexandria, VA 22314

RE: Comments on Proposed Rulemaking for Part 723; RIN 3133-AE37

Dear Gerard Poliquin,

I am writing on behalf of Pine Bluff Cotton Belt FCU, which serves Union Pacific Railroad and several other businesses in the Jefferson County area. We have 6,200 Members and \$66 million in assets. Pine Bluff Cotton Belt FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the member business lending regulation.

The additional flexibility in the proposed rule would allow for many additional lending options for our Credit Union and its members. The clarification of the MBL vs Commercial Lending will allow to Credit Unions design a program to specifically fit our member's needs.

The revision of the 12.25% cap is a welcomed change, the current 12.25% cap was a complication to the current rule, while the new calculation meets the FCU Act's requirements and removes this unnecessary provision. Although the revision of the 12.25% cap is positive step, unfortunately this modest change simply does not help small credit union to offset the expense of the program with the income on such a small portfolio.

The exemption of Credit Unions under \$250 million in assets will serve as some welcomed regulatory relief along with the elimination of the waivers previously required.

The proposed change in this regulation would be a significant step in the right direction. We support the efforts towards regulatory relief and how it will allow credit unions to truly meet their member's personal and commercial needs.

Realizing these rules change will result in a much more detailed exam of the Credit Union portfolio, we would appreciate the opportunity to comment in reference to guidance NCUA will provide to examiners.

Thank you for the opportunity to comment on the Proposed Rule and for NCUA's efforts to remove current requirements that are not specific to the Federal Credit Union Act allowing us the opportunity to serve all our members business lending needs.

Respectfully,  
Greg James  
CEO  
Pine Bluff Cotton Belt FCU  
CC: Cuna, CCUL

