

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 Capital Credit Union which serves members across the State of North Dakota with branches in Bismarck, Mandan, Hazen, Beulah, New Salem and Fargo. We have over 30,000 Members and \$398 million in assets. I appreciate the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the member business lending regulation.

I am in favor of the proposed amendments. The proposed changes take a much more principle based approach to member business lending. This approach allows our business department which is led by a Chief Lending Officer and Business Services Manager with combined experience of 40+ years to continue to help our business members. This department has shown that they can write loans that perform well and keep a well-diversified portfolio. The removal of the waiver process is very positive as well. Capital Credit Union has applied and been granted waivers in the past. The process was very slow and at times got in the way of our ability to help our members.

Although the proposal is well written and detailed the main area of concern is the consistency in the application of guidance. In reading the rule it is clear that the NCUA will issue guidance. The question is how this guidance will be consistently used by examiners when we have different examiners onsite ever year or every few years.

Overall, I agree with the direction of the proposed rule and with a little better clarification on the application of guidance believe this will truly help Credit Unions help their business members.

Thank you for the opportunity to comment on the this Proposed Rule and for considering our views on the proposed MBL rule.

Sincerely,

Jon Griffin
VP-Risk Management
Capital CU

cc: CUNA, CCUL