

From: [John Hirabayashi](#)
To: [Regulatory Comments](#)
Subject: Comments on Proposed Rulemaking for Part 723
Date: Wednesday, August 26, 2015 6:40:05 PM

Dear Secretary of the Board Poliquin,

I appreciate the efforts on the part of the National Credit Union Administration to expand the ability for credit unions to meet the lending needs of small businesses. Community First Credit Union of Florida is a community based credit union that currently banks over 4,000 small businesses throughout the greater Jacksonville metropolitan area. Since the Great Recession small businesses have been the engine of job growth in our local economy. By removing or modifying many of the prescriptive requirements like personal guarantees and LTV requirements, the NCUA's proposed rule will greatly expand our ability to meet the borrowing needs of small businesses. This will lead to greater job growth, expanded local economic output, and ultimately an improved quality of life in our community.

I applaud the NCUA's efforts to reduce the regulatory burden on credit unions and position us for growth in this increasingly important segment of our market. Over the past ten years Community First has developed a great deal of specialized knowledge and expertise in meeting the lending needs of small businesses. Now is the time to overhaul MBL regulation to address the borrowing needs of small businesses and recognize the expanded capabilities that credit unions have developed to meet these needs.

Sincerely,

John Hirabayashi
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