

August 27, 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,

I, on behalf of Flasher Community Credit, appreciate the opportunity to provide comment to the National Credit Union Administration (NCUA) with regard to the proposed amendments to Part 723 – Member Business Loans; Commercial Lending.

Flasher Community Credit Union was organized in 1939 in the rural community of Flasher, ND. We have been serving our community with business loans for over 70 years. We are a small credit union with assets of \$11.4 million and 847 members. We currently have a two person staff. As we have grown, we have used technology to meet our member's needs. We currently have staff with over 20 years of experience in business lending. We have not experienced any loan losses in over 4 years. Our delinquency rate is currently under 0.5%. We have been very successful in meeting our member's needs with member business loans, consumer loans and real estate loans.

We look for the proposed rule to increase the member business loan balances we can keep in house. We currently have to participate the majority of our member business loans because of the lending limit on member business loans. Participation loans slow down our response time to loan requests as well as takes away from our earnings as we have to share the interest the loan generates. We also look for the proposed rule not to require additional staffing to meet the staff expertise requirements. We have the staff expertise required for the member business loans we make at this time. Additional segregation of duty requirements would force us to add additional staff that would compromise the growth and financial stability of our credit union.

Thank you for this opportunity to share our comments and concerns.

Sincerely,



Darla Schafer, manager