

Corporate Office
10951 Broadway
Crown Point, IN 46307
(800) 276-8324

Department Fax Numbers
(219) 662-3531 Accounting
(219) 662-3223 Loans

www.techcu.org



BRANCHES

Calumet City, IL 60409
1011 River Oaks Dr.
(708) 891-3380

Crest Hill, IL 60403
2244 Weber Rd.
(815) 744-7650

Crown Point, IN 46307
10951 Broadway
(219) 663-5120

East Chicago, IN 46312
2310 E. Columbus Dr.
(219) 398-1613

Gary, IN 46408
2155 W. Ridge Rd.
(219) 884-4045

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1800 E. Commercial Ave.
(219) 690-1370

Merrillville, IN 46410
7901 Grant St.
(219) 791-0629

Vaiparaiso, IN 46383
370 Morthland Dr. (U.S. 30)
(219) 477-6805

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Re: Proposed Rulemaking for Part 723 - Member Business Lending

Dear Mr. Poliquin
Tech Credit Union, Crown Point, Indiana (Charter #68225) appreciates the opportunity to submit comments on the National Credit Union Administration's Proposed Rulemaking for Part 723- Member Business Lending (MBL).

We appreciate the NCUA Board thoroughly reviewing the MBL rule and modernizing the rule in a way that provides greater flexibility for our credit union to make these loans, streamlining the process by eliminating the requirement for waiver requests, and providing some needed regulatory relief against the arbitrary cap that is in place.

We support NCUA's move to a principles-based rule and away from a prescriptive, inflexible rule. It is important that credit unions have the flexibility to manage their commercial lending programs with the ability to adjust as necessary to meet the needs of the membership. We support eliminating those restrictive requirements from the rule that are not specifically required by the Federal Credit Union Act (FCUA). We would encourage NCUA to utilize this approach with other regulations

We believe that the changes being proposed, as listed below, for Member Business Lending Regulations are very positive and important for development and growth of our Credit Union's future in Commercial Services in the areas we serve.:

1) Waivers No Longer Required:

The items that no longer would require waivers to be approved are very beneficial in approving loan requests in a quick time frame to compete with institutions that are not bound by the same regulations.

2) Personal Guarantees:

The change to not requiring a full personal guarantee would allow credit unions the flexibility to do more loans for very strong borrowers, with mitigating factors to offset the lack of the guarantee, which may not be required at other financial institutions. We fully intend to continue to ask for full guarantees where they are appropriate.

3) Removal of C&D Limit:

This change is very beneficial as we are seeing an increase in these requests far above our limit allowed. In most cases we are approving the final end loan to be held at our



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institution or there are purchase agreements in place for the sale of the building at completion. This would be a very positive change for the future of our credit union.

Finally, the proposal is recommending an effective date of 18 months after the proposal is finalized. We would like to see NCUA allow credit unions that are prepared to follow the new requirements earlier than 18 months after the final rule be allowed to do so at their discretion. We believe that this will allow those credit unions, especially ours, to begin benefitting from the intended regulatory relief as soon as they are positioned to do so.

Thank you for the opportunity to comment on the proposed member business lending regulations. We are encouraged that NCUA was willing to approach this revision in a way that provides regulatory relief to credit unions offering MBLs. We hope that through the issuance of supervisory guidance, NCUA does not undermine the regulatory relief intended in this proposed regulation

Sincerely,

Michael Huesey

President

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