

August 31, 2015

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

Re: 15-EA-16 NCUA – Member Business Loans & Commercial Lending Proposal.

Dear Mr. Poliquin,

As a member and employee of a credit union for over 12 years, please accept this letter as my support for making the changes to the MBL regulations that give credit unions flexibility and individual autonomy to safely and soundly provide commercial and business loans to members.

Since the conservative MBL regulations were introduced, many credit unions have become experienced commercial bankers. In addition, many credit unions have taken advantage of the numerous MBL educational opportunities that are available through NCUA, CUNA, NFCUA and other organizations.

Please also consider the below specific feedback regarding the proposal:

723.2 – Definitions

Common Enterprise

“The expected source of repayment for each loan...is the same for each borrower and no individual borrower has another source of income from which the loan...may be fully repaid.”

- I am unclear on this definition and propose redefining or providing an example to better elaborate.

Control

“...has the power to vote 25 percent or more...”

- 25% control equals little to no control
- Suggestions
 - Go with option 1- “over 50%” or
 - Use options 2 & 3 to cover the situations where an individual owning less than 50% can keep control of the company.

Direct benefit “...proceeds are used to acquire property, goods, or services.”

- Replace the word “property” with “tangible and in tangible assets”, which would cover a greater array of products, services and ownerships, rights to contracts, etc.

723.6 Construction and development loans

- I am in agreement with this section and feel it would allow us to better service our members and their needs.

I am in support the overhaul of NCUA's current MBL regulation, changes reflecting a more principle based regulation, which I feel will create greater flexibility and operational abilities within the MBL or commercial program.

Thank you for this opportunity to share my comments.

Sincerely,

A handwritten signature in cursive script that reads "Barbara J. Messier". The signature is written in dark ink and is positioned above the printed name and address.

Barbara J. Messier
220 Donald Lynch Blvd
Marlborough, MA 01752