

From: [Barry Shaner](#)
To: [Regulatory Comments](#)
Cc: [Carole D. McCallister \(CMcCallister@ohiocul.org\)](mailto:CMcCallister@ohiocul.org)
Subject: Comments on Proposed Rulemaking for Part 723; RIN 3133-AE37
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Dear Mr. Poliquin,

I am writing on behalf of the 70,000 members of Directions Credit Union, located in northwest and north central Ohio. These members have entrusted over \$600 million of their hard-earned dollars with Directions. Directions serves many different communities, small and large, and small business lending is an important part of how we support our members and the communities we serve. We appreciate and welcome the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the member business lending regulation.

In the 10 plus years that this credit union has successfully lent to small business, we've found that every business and every loan considered is different. This type of lending is much less homogeneous than lending to consumers. Moving from prescriptive rules more suited to a homogeneous process, to a principle based approach is logical, and will undoubtedly help us do more to serve the small businesses in our communities as we are able to be more flexible in meeting their needs.

Changes proposed in the way that the calculations are made regarding the statutory MBL cap will also benefit our members and our communities. These changes make it less likely that we will need to decide whether or not to help a small business based on the regulatory cap instead of the business's merits.

The removal of prescriptive rules will require that our credit union adjust our policies and procedures to address additional things. We understand and embrace that, as this is our responsibility. It will also make the examination process of business lending programs more challenging for regulators. We appreciate that, and trust that the agency will supply the necessary knowledge and support to its examiners in the field.

NCUA's proposed changes to the rule are logical, appropriate, and will benefit millions of credit union members and the communities in which they live. I thank you for this effort; and, for the opportunity to offer my comments.

Sincerely yours,

Barry A. Shaner
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