



August 31, 2015

Mr. Gerard Poliquin

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

Re: 12 CFR Part 723 – Member Business Loans & Commercial Lending Proposal

Dear Mr. Poliquin:

As the Senior Vice President of Branch Services at Digital Federal Credit Union (DCU), I appreciate the opportunity to provide comments on the proposed changes to the Member Business Loan regulations.

DCU has an experienced business lending team and we are an active business lender. As such, I fully support making changes to the MBL regulations which would give credit unions the additional flexibility to prudently meet the borrowing needs of member-owned businesses. I further believe that, overall, the proposed changes are very reasonable and will eliminate unnecessary regulatory burdens within the credit union community and NCUA.

That said, I do have the following suggestion regarding loan to value under 723.2. The regulation states "...lesser of purchase price or market value for collateral held 12 months or less..."

1. Regardless of how long the collateral has been held, market value should be used. If the 12 months or less is kept, expand the definition to cover the purchase price plus the cost of any improvements.

Thank you again for the opportunity to express my opinions regarding this proposal for Member Business Loans & Commercial Lending.

Sincerely,

A handwritten signature in black ink, appearing to read "Carol A. Raposa".

Carol A. Raposa  
Senior Vice President of Branch Services

