

From: [Don C. Miller](#)
To: [Regulatory Comments](#)
Subject: Proposed MBL Changes
Date: Friday, August 28, 2015 4:55:23 PM

August 28, 2015

Gerald Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

Re: Proposed MBL changes

Dear Mr. Poliquin:

The purpose of this letter is to provide feedback related to the proposed MBL rule changes. Gesa Credit Union is a \$1.5 billion credit union located in Richland, Washington, with a membership of approximately 130,000 members. We have served the members of our community since the early 1950s.

Credit unions provide business members access to capital that is necessary for businesses to grow and prosper. I have reviewed the proposed rule changes and believe most of the changes will be beneficial to credit union MBL programs which is directly beneficial to business members. The one concern I do have is the potential adverse change to Part 741. Currently, several states have state specific MBL rules that have helped the state regulatory body evaluate and manage the credit union MBL programs in their state. I believe it is important for the states to retain this ability so I am requesting that the NCUA not make any adverse changes to part 741.

In conclusion, I do support the majority of the proposed MBL changes but am opposed to any adverse changes to Part 741. I appreciate the opportunity to provide feedback and for your consideration.

Respectfully,

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