

# PBA FEDERAL CREDIT UNION

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AUG28'15 AM 7:43 BOARD

August 26, 2015  
National Credit Union Administration  
1775 Duke St  
Board Secretary  
Alexandria, VA 22314

RE: Comments on Proposed Rulemaking for Part 723; RIN 3133-AE37

Dear Gerard Pollquin,

I am writing on behalf of Pine Bluff Arsenal FCU. PBA FCU appreciates the opportunity to provide comments to the National Credit Union Administration (NCUA) on its proposed amendments to the member business lending regulation.

The additional flexibility in the proposed rule would allow for many additional lending options for Credit Unions and its members. The clarification of the MBL vs Commercial Lending will allow Credit Unions to design a program to specifically fit member's needs.

The revision of the 12.25% cap is a welcomed change, the current 12.25 % cap was a complication to the rule current rule, while the new calculation meets the FCU Act's requirements and removes this unnecessary provision. Although the revision of the 12.25% cap is positive step, unfortunately this modest change simply does not help small credit unions to offset the expense of the program with the income on such a small portfolio.

The exemption of Credit Unions under \$250 million in assets will serve as some welcomed regulatory relief along with the elimination of the waivers previously required.

The proposed changes in this regulation would be a significant step in the right direction. We support the efforts towards regulatory relief and how it will allow credit unions to truly meet their member's personal and commercial needs.

Thank you for the opportunity to comment on the Proposed Rule and for NCUA's efforts to remove current requirements that are not specific to the Federal Credit Union Act allowing us the opportunity to serve all of our members business lending needs.

Respectfully,  
Kelli Pierce  
Manager  
Pine Bluff Arsenal FCU  
CC: Cuna, CCUL