

From: [Kendra Uusitalo](#)
To: [Regulatory Comments](#)
Subject: Kendra Uusitalo - Comments on Proposed Rulemaking for Part 723
Date: Friday, August 28, 2015 2:36:00 PM

Dear Gerard Poliquin,

I am writing on behalf as a Commercial Lender for Digital Federal Credit Union.

After reading the proposed MBL regulation changes, I want to write in support of the changes. As stated in the proposed changes, credit union's will be given greater flexibility and autonomy in offering commercial loans. Clearly these proposed changes will eliminate limitations and restrictions inhibiting credit unions from serving their business members fully.

My comments are as follows:

- I am in support of changing from the current prescriptive approach to a more principal based methodology.
- I disagree with the loan-to-value proposal calling for the value in the first 12 months being limited to cost. A lot can happen in a year's time. Significant improvements can be made, cap rates can fluctuate, NOI can increase/decrease, a value of a property should never be considered static.
- Details should be provided on the minimum requirements that are acceptable for establishing a safe and sound member business lending program.
- The proposed rule would remove all of the requirements necessitating waivers, resulting in the elimination of waivers. This would provide regulatory relief for all credit union.

Again, I am in support of the NCUA's proposed changes to the MBL rule. Thank you for giving me the opportunity to provide comment on the proposed rule.

Sincerely,

Kendra L. Uusitalo

Commercial Lender

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