

August 28, 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 Poliquin,

I am writing on behalf of West Virginia Central Credit Union, which serves multiple SEGs. We have almost 17,000 Members and \$146 Million in assets. WV Central appreciates the opportunity to provide the comments to the National Credit Union Administration (NCUA) on its proposed amendments to the member business lending regulation.

We believe that the overall change to member business lending this is being proposed is positive and will allow credit unions to better serve their members. The flexibility will allow credit unions to create a well thought out program that best meets their needs.

Our credit union primarily makes participation loans with other credit unions through Cooperative Business Services (CBS). This process works very well for us and being able to make these loans and not count them towards the current cap will allow us to continue to make loans that produce income for our members without assuming considerable risk.

Thank you for the opportunity to comment on the this Proposed Rule and for considering our views on the proposed MBL rule.

Sincerely,

Michael Tucker
President/CEO
WV Central Credit Union

cc: CUNA, CCUL