

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 Directions Credit Union, which serves the Northwest and Central OH communities. We have 60,000 Members and \$600 million in assets. Directions Credit Union appreciates the opportunity to provide the comments to the National Credit Union Administration (NCUA) on its proposed amendments to the member business lending regulation.

**The adjustments in the calculations of the MBL statutory loan cap will assist credit unions in making more member business loans.**

**The removal of the waiver process will also benefit credit unions and enable them to reach out to more small businesses.**

**Directions credit union already has a credit risk rating system in place so we can comply with the new proposed rule.**

Thank you for the opportunity to comment on the this Proposed Rule and for considering our views on the proposed MBL rule. We support the NCUA's efforts to modernize the MBL rule. Thank you for the opportunity to comment on this proposed rule and for considering our views.

Sincerely,

Patricia DeCesare  
Commercial Loan Manager  
Directions CU

cc: CUNA, CCUL