

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,

Boulder Dam Credit Union is a state-chartered, privately insured, credit union serving those that live, work and worship in Boulder City, Nevada. We have proudly served our members for over 75 years and currently have a membership 22,000 strong! While the changes that the Agency promulgates do not directly impact our credit union, they do affect the credit union indirectly by the interpretation of those rules by the Financial Institution Division here in the state of Nevada.

While our credit union is well within current MBL limits, we support the Agency's work towards modernizing the MBL regulation. During the terrific downturn that the United States, and Nevada most particularly, underwent, many individuals looked to start small businesses as a means to persevere and thrive. Having these regulations in place 8 years ago would have allowed many credit unions to expand their lending portfolios, thereby helping members in our state to recover from the Great Recession far faster. Specifically, we applaud the exclusion of the following loan types from the MBL limit:

- 1-4 family, non-owner occupied property loans.

- Vehicle loans made to small business owners.

- Business participation loans.

We note, however, that the following modifications would be most helpful in getting loans to

members quicker:

- Implement sooner than 18 months.
- Exclude MBLs from the Net Long-Term Assets Ratio (NLTAR) for MBLs with remaining terms of five years or less or rate resets of five years or less.

It is our belief that the changes to the MBL regulation that the NCUA is going to make will allow for more members to have access to small/micro business financing in our country through expanded offerings from credit unions. Many credit unions presently do not provide this service simply because of the current restrictive regulation.

Again, 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,

Sue Longson
Advocacy Specialist
Boulder Dam CU

cc: CUNA, CCUL